



Botley West Solar Farm Applicant Responses to Relevant Representations

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This document provides the response by Solar Five Ltd. (the Applicant) to the Relevant Representations (the 'RRs') which were published by the Planning Inspectorate (PINS) on 19 March 2025, relating to the Development Consent Order Application (the 'Application') for Botley West Solar Farm Project (the 'Scheme').
- 1.1.2 The period for registering as an Interested Party, through the submission of a relevant representation, ran from 8 January to 28 February 2025.
- 1.1.3 A total of 1115 RRs were submitted to the Examining Authority by Interested Parties in response to the Scheme, including 1086 from members of the public and businesses. The main RRs were published on 19 March 2025 to the Planning Inspectorate's website (PINs Reference: EN010147), with additional submissions accepted by the Examining Authority on the 28 March and 17 and 22 April 2025. The full list of RRs is set out in the Examination Library on the PINs website.

1.2 Structure of the report

- 1.2.1 This document provides responses from the Applicant to the matters raised in the Relevant Representations and is structured as follows:
- Table 1.1 lists responses to **all** RRs received, from members of the public, businesses and the host authorities, Parish Councils, statutory consultees and non-statutory organisations
 - Table 1.2, in Appendix A, lists responses to the host authorities, statutory consultees, NGET and Network Rail, of which there are 15 in total.
- 1.2.2 References to the Application documentation, as submitted to the Planning Inspectorate on 15 November 2024, are provided in accordance with the referencing system as set out in the Planning Inspectorate's 'Botley West Solar Farm Examination Library'.
- 1.2.3 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 1 to the Planning Inspectorate.
- 1.2.4 Additionally, submissions to the Planning Inspectorate post 15 November 2024 carry revised indications to identify by which deadline the submission had been made to the Planning Inspectorate.
- 1.2.5 This document is accompanied by the following Appendices:
- Appendix A – Table 1.2 - Responses to host authorities, statutory consultees, NGET and Network Rail.

Table I-1: Abbreviations used in this document

Abbreviation	Definition
ALC	Agricultural Land Classification
CDC	Cherwell District Council
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
ES	Environmental Statement
ExA	Examining Authority
HDD	Horizontal Directional Drilling
MW	Megawatts
NGET	National Grid Electricity Transmission
NSIP	Nationally Significant Infrastructure Project
OCC	Oxfordshire County Council
PINS	The Planning Inspectorate
PV	Photovoltaic
PVDP	Photovolt Development Partners GmbH
RR	Relevant Representation
SPV	Special Purpose Vehicle
VWHDC	Vale of White Horse District Council
WODC	West Oxfordshire District Council

2 Applicants’ Comments on Relevant Representations

Table 1.1: Applicants’ Comments on Relevant Representations

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
7, 11, 44, 62, 64, 86, 86, 89, 143, 145, 169, 254, 260, 310, 335, 416, 435, 441, 474, 510, 517, 586, 635, 656, 672, 691, 745, 813, 819, 851, 856, 900, 924, 926, 927, 961, 988, 1023, 1031, 1042, 1065, 1067, 1077, 1088, 1093	UK Climate and Solar Suitability	Respondents stated that the UK particularly Oxfordshire is poorly suited for large-scale solar development due to high latitude, frequent cloud cover, and short winter daylight hours, resulting in limited generation capacity when energy demand is highest.	The area of Oxfordshire identified for the Botley West Solar Farm benefits from moderate to favourable levels of solar irradiation in comparison to much of the UK, making it a viable and efficient location for solar PV generation. The region’s landscape characterised by broad stretches of flat or gently sloping farmland further contributes to its suitability for hosting a large-scale solar energy project. Importantly, solar photovoltaic panels do not rely exclusively on direct sunlight to function. While clear skies may result in higher energy yields, the system will continue to generate meaningful levels of low-carbon electricity even under overcast conditions. The installation is also designed to operate effectively during the shorter and less sunny winter months, ensuring year-round contribution to the electricity grid despite seasonal variations in daylight. The Project is designed to operate effectively under UK solar conditions using 1.8–2.2 million PV modules, delivering a peak capacity of 1,200–1,375 MWp and approximately 840 MWe AC output (Table 6.3, Chapter 6: Project Description [APP 043]). The modules comply with international standards (IEC 61215-1:2021), ensuring reliable performance in low irradiance and variable weather (Section 6.4.8 [APP 043]).
198, 199, 859, 861, 863,	Carbon Payback and Lifecycle Impact	Respondents stated that the Botley West Solar Farm may not repay the significant carbon debt incurred during its construction and eventual decommissioning, raising doubts about its environmental viability. Some respondents stated that the proposal could affect its intended climate benefits and be a distraction from more effective and reliable environmental strategies. One respondent noted a lack of rigorous analysis in the project’s modelling, particularly the omission of broader ecological and socio-economic impacts in a high-value area such as West Oxfordshire.	The Project’s whole-life GHG assessment estimates total construction emissions at 717,006 tCO₂e, while operational and decommissioning phases result in net avoided emissions of approximately -7,262,602 tCO₂e, leading to a net lifetime saving of -6,545,595 tCO₂e. Under the current grid average scenario, the carbon payback period is 6 years (Table 14.16, Section 14.10 Chapter 14 - Climate Change, [APP 051]) The Project has been assessed using a ‘reasonable worst-case scenario’ approach, as set out under the Rochdale Envelope principle, ensuring robust consideration of potential impacts including ecological and land-use effects (Section 6.1.18, [APP 043]). Broader impacts are addressed through specialist chapters of the Environmental Statement, including those on Landscape and Visual Impact, Soils, Socio-Economics, and Agriculture.
67, 148, 256, 263, 274, 332, 347, 522, 592, 611, 627, 645, 649, 654, 658, 667, 677, 722, 728, 746, 822	Comparative Alternatives: Wind, Nuclear, Hydro	Solar PV was described as relatively outdated and inefficient (with efficiency cited at approximately 10%) compared to onshore wind (~20%), offshore wind (~45%), and nuclear (~90%). It was suggested that more efficient and scalable options—such as wind turbines or rooftop solar—should be prioritised. The scale of the project was perceived as excessive, potentially exceeding local energy needs.	Given the urgency of achieving the UK’s 2050 Net Zero commitments, action within this decade is essential. While nuclear power may play a supporting role in the long term, relying on its future deployment is not a viable strategy for tackling the immediate challenges of climate change. NPS EN-1 indicates that the role of nuclear power will be in the 2050s (paragraph 3.3.53). Solar and wind energy offer complementary benefits, with generation peaks that often occur under contrasting seasonal conditions. Solar installations such as Botley West perform optimally in the sunnier, longer days of summer, while wind turbines tend to be more productive during the windier, darker winter months. This seasonal variation in output aligns well with

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		There was concern that overreliance on solar energy could create a single point of failure in the renewable energy mix and hinder the development of a more balanced, national strategy for sustainable energy and land use.	patterns in national electricity demand. Wind turbines are generally unsuitable for built-up areas due to noise and infrasound, which are often met with strong local resistance. Just maintaining the current ratios of installed capacity to meet local energy demand in Oxfordshire, would require 2.3GW of solar. There is no clear or obvious prospect that other forms of renewable energy could step up to meet this demand, so solar presents an obvious solution. Assuming a land use take of 1.5ha per megawatt of installed capacity, accommodating this level of deployment would require around 3,450 hectares of land. Botley West solar farm would materially help address that local demand, but even then, there would still be a shortfall in capacity. Botley West would meet about one third of that demand (840MW of the 2300MW demand - 37%).
888, 1007	Planning and Decision Transparency	Concerns were raised that Botley West’s viability is heavily dependent on the delivery of a new substation, which is not included within the current DCO application. It was noted that other developments, including a Battery Energy Storage System (BESS) and a separate solar farm near Buckland, may also rely on the same substation. The potential future inclusion of a BESS—possibly covering several hectares—was said to raise issues related to traffic, siting, and cumulative impacts. It was stated that the application does not adequately apply the mitigation hierarchy or demonstrate good design as required by the National Policy Statements.	The Botley West Solar Farm requires a new 400kV National Grid Electricity Transmission (NGET) substation to enable the export of electricity to the National Electricity Transmission System (NETS). The Grid Connection Statement [APP 019] confirms that this infrastructure is essential to the functioning of the project, with two potential locations identified for the substation: one within the Order Limits in the western part of the Southern Site, and one on adjacent land to the west of the Southern Site, both situated south of Farmoor Reservoir (Section 2.1.2, [APP 019]). The Funding Statement [APP 022] further specifies that the area to be allocated for the NGET substation is between 2.3 and 3.8 hectares, with an estimated footprint of approximately 87 metres by 30 metres and a likely maximum height of 12 metres, excluding connecting towers (Section 2.11). The development does not include any Battery Energy Storage System (BESS). As stated in Chapter 6: Project Description [APP 043], energy generated by the project will be stored, where required, via BESS facilities already connected elsewhere on the grid, such as the 50MW EDF BESS at Cowley substation (Section 6.4.3, [APP 043]). No battery storage infrastructure forms part of the Development Consent Order (DCO) application, and no associated environmental effects have been assessed. Any future BESS intended to support the project would require a separate planning application and would be subject to its own environmental impact assessment, including matters such as location, land use compatibility, flood risk, proximity to dwellings, and visual effects. Cumulative impacts are addressed across the Environmental Statement, and the Project design includes embedded mitigation and follows the mitigation hierarchy and relevant policy guidance (NPS EN-1 and EN-3).
58, 184, 217, 273, 292, 352, 378, 384, 427, 438, 466, 479, 508, 521, 529, 584, 596, 695, 730, 750, 774, 820, 827, 855, 1093, 1097	Questionable Output Projections	Concerns have been raised regarding the technical feasibility, efficiency, and overall justification of the Botley West Solar Project. Observations focus on the UK’s relatively low levels of solar irradiance and frequent overcast conditions, which may limit the performance and economic viability of large-scale solar installations when compared to alternative renewable energy sources such as wind or nuclear. The projected installed capacity of 840 MW has been questioned considering uncertainties around	Output is based on a worst-case assessment approach, accounting for local conditions and ensuring robust evaluation (Section 6.4.6, [APP 043]). Modules are fixed, tilted (12–18°), and spaced to reduce shading and optimise yield (Table 6.3, [APP 043]). Chapter 6: Project Description [APP 043] confirms that the proposed development seeks consent for a maximum export capacity of up to 840 MWe (AC), with a peak DC module capacity of up to 1,375 MWp, and an indicative maximum of 2.2 million PV modules. The Rochdale Envelope used for the environmental assessment has been designed to achieve the generation export capacity. (Section 6.4.6; Table 6.3).

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		actual generation potential, including assumptions related to: • solar exposure • panel efficiency • No performance calculations. • Wrong Productivity estimates • the exclusion of battery storage from the application.	This modelling incorporates site-specific irradiance data, system losses, and a panel degradation rate of 0.5% per year, consistent with Tier 1 photovoltaic module performance assumption. Battery energy storage infrastructure is not included within the scope of the application. As confirmed in the Planning Supporting Statement [APP 225], battery storage is not proposed, and the balancing of electricity generated by the scheme is expected to be managed by the wider electricity network, including other facilities in the region (Section 2.10.10, [APP 225]). The scheme benefits from being near its consumers, minimizing transmission distances and associated losses.
24, 55, 90, 90, 96, 121, 154, 183, 220, 229, 231, 244, 249, 253, 258, 262, 268, 285, 295, 334, 340, 367, 383, 385, 385, 394, 467, 478, 478, 479, 558, 579, 580, 601, 602, 607, 613, 613, 631, 638, 644, 683, 715, 716, 733, 780, 798, 806, 810, 825, 849, 888, 897, 901, 923, 949, 991, 1008, 1078, 1081, 1083	Scale and Efficiency Mismatch	Solar panels in the UK typically operate at efficiencies between 10–20% and generating significant amounts of electricity requires large areas of land. This scale of land use can displace agriculture and limit opportunities for biodiversity enhancement. Within this context, the scale and configuration of the Botley West Solar Farm may not align well with future energy system needs or environmental priorities. The Botley West project involves extensive infrastructure, long transmission distances, and does not include integrated energy storage, which limits its effectiveness in meeting demand when generation is low.	Large-scale solar installations represent one of the most effective ways to generate clean electricity while using relatively little land. Such projects are typically located in rural areas, where suitable land is more widely available and conditions like solar irradiance and grid access are more easily met. The selected modules achieve an efficiency of up to 23% under standard test conditions, reflecting the project’s decision to use advanced, high-efficiency technology. According to National Grid’s Future Energy Scenarios (2022), meeting national decarbonisation targets will require between 57 and 92 GW of solar capacity by 2050. The issue of long-distance transmission and energy losses is addressed in Chapter 6: Project Description. It outlines that onsite electrical infrastructure is designed to minimise voltage drop, using a hierarchy of voltage levels (DC → MV → HV) and an efficient grid connection via the NGET substation (sections 6.4.11 to 6.4.17 [APP-043]). While losses are inevitable in any large-scale grid connection, the routing has been optimised to mitigate unnecessary energy dissipation. The scheme benefits from being near its consumers, minimizing transmission distances and associated losses.
366, 1030, 1067, 1068	Outdated technology	The Respondents have noted that while silicon-based panels are widely used and commercially proven, ongoing advances in solar research are producing new materials such as Perovskite-based PV cells that have the potential to offer higher efficiencies and improved performance in lower sunlight conditions. The use of current-generation panels may limit the long-term adaptability of the installation if more advanced technologies become commercially viable soon. The development is intended to operate for up to 40 years, during which time the technological landscape may evolve significantly.	The Botley West Solar Farm is designed with a flexible framework that accommodates the most up-to-date commercially available photovoltaic (PV) technologies at the time of procurement. While perovskite photovoltaic (PV) technology holds significant promise due to its high efficiency potential, low manufacturing costs, and flexibility, it is not yet a viable alternative for large-scale solar farms such as Botley West. Perovskite PV technology was not selected for the project due to ongoing challenges with long-term stability and sensitivity to environmental factors such as moisture and UV radiation. Additionally, concerns about the potential release of toxic lead compounds in case of damage or improper disposal weighed against its use at this stage of technological maturity. The Applicant has applied the Rochdale Envelope approach to define a reasonable range of parameters for assessment, ensuring that environmental effects are evaluated on a “worst-case” basis while allowing for flexibility in final design. This includes the possibility of adopting newer, more efficient solar modules if available at the time of procurement. Panel heights, orientations, and materials are all selected to balance performance, visual considerations, and future adaptability (Chapter 6, Sections 6.4.6–6.4.7 [APP-043]). The Project lifespan is expected to span up to 42 years, including construction, operation, and decommissioning phases (Chapter 6, Page 5, [APP-043]), and the infrastructure has been designed with long-term

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			resilience and operational integrity in mind. While the Environmental Statement does not specifically mention emerging technologies such as perovskite PV, the development parameters are not locked into a particular generation of panel, allowing for innovation up to the point of installation. While the project uses currently available PV technology, its modular and scalable approach allows for procurement of up-to-date equipment at the time of construction.
1. Project description and Design parameters			
15, 36, 221, 271, 278, 295, 343, 383, 394, 711, 833, 882	Fencing, Security, and Access Restrictions	• The proposed 2.3m perimeter fencing, including “deer fencing,” may affect the character of the rural landscape and limit public access through the site. • CCTV and other security infrastructure introduce additional physical and visual barriers within the area as well as privacy intrusion. • Public rights of way may be affected, with limited information on how access and landscape integration will be maintained.	The project will use agricultural-style deer fencing which is large gauge wire mesh fixed between timber poles, 1.8 to 2.1 metres high, to secure key infrastructure including solar PV modules, PCS, substations, and electrical compounds (Chapter 6: Project Description, section 6.4.38 [APP-043]). The fencing is described as visually permeable and commonly used in rural settings to help minimise visual obstruction, preventing incursion by deer whilst allowing smaller mammals to pass through. The location of fencing will not remove or affect Public Rights of Way, and new permissive paths are being proposed in parts of the Site. CCTV systems will be installed on steel or wooden poles, 3.0 to 4.0 metres high, positioned 1 to 2 metres inside the fenced boundary. The cameras will include infrared capability and emergency lighting, with no permanent external lighting No. of CCTV cameras – 14 (two located on each of the six Secondary Project Substations, and two on the Main Project Substation). (Table 6.4 and section 6.4.38 [APP-043]). Given their limited height, siting close to the perimeter fencing, the visual impact of the CCTV infrastructure is expected to be minimal. It is standard practice on solar infrastructure projects that CCTV systems be inward-facing, focused on internal infrastructure. Public Rights of Way (PRoW) crossing or adjacent to the site will remain open during construction and operation. Gates and access points will be provided where fencing crosses or runs alongside PRoW, with additional hedgerow planting and screening measures to reduce visual impact and maintain landscape integration (Chapter 17: Agricultural Land Use and Public Rights of Way, pages 27–30; section 17.8.7 [APP-054]).
18, 212, 223, 334, 346, 393, 423, 499, 501, 555, 567, 616, 711, 718, 855, 950, 996, 1093	Insufficient Design Detail / Unclear Parameters	Observations have been made regarding the clarity and consistency of the application’s design information. • Variation in the width and treatment of buffer zones across the site • Limited detail regarding the potential inclusion or exclusion of battery energy storage infrastructure • Lack of long-term management proposals for hedgerows and land use. • Project title “Botley West Solar Farm” may not accurately reflect the geographic extent of the development, which spans multiple areas beyond Botley. • The DCO application does not explain how panel performance will be measured or how underperformance will be detected and remedied.	Design details, including the proposed infrastructure, panel layout, fencing, and indicative separation distances from site boundaries, are set out in Chapter 6: Project Description [APP 043], with relevant quantitative parameters provided in Table 6.3. The configuration of the development has been guided by a landscape-led design approach, incorporating buffer distances to protect existing hedgerows, trees, and other natural features, which results in different buffer distances. This strategy, as described in the Planning Supporting Statement [APP 225], Section 2.10.100, was informed by landscape, ecological, and heritage considerations, and supported by new planting and siting adjustments to minimise visual and character impacts. The application does not include battery energy storage infrastructure, as confirmed in [APP 043], Section 6.4.3, and reiterated in the [APP 225], Section 2.10.10, which states that electricity balancing will be managed by the wider grid network, including other facilities in the region. Long-term management of hedgerows, grassland, and other landscape features is addressed in the Outline Landscape and Ecology Management Plan [APP 235], which outlines proposed planting,

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
			enhancement, and maintenance activities throughout the lifetime of the project, including hedgerow retention and reinforcement where appropriate. Regarding the project title, it is recognised that the Botley West Solar Farm spans three main land parcels across a wider area of West Oxfordshire. The Consultation Report [APP 024], Section 1.1.4, provides context on the naming and describes how the geographic scope of the project was communicated during public consultation and engagement activities. The Project name derives from the location of the grid connection point, as described in para. 6.1.1. of the ES Chapter 6 Project Description [APP-043]. The performance of the solar PV panels will be monitored using approximately 50 to 60 pyranometers installed on panel frames or adjacent poles to measure solar irradiance as mentioned in Chapter 6: Project Description [APP 043] (Section 6.4.6, Table 6.3,). These, combined with 156 Power Converter Stations (PCS) housing inverters and monitoring systems (Section 6.4.12), will enable performance data collection for specific groups of panels. This infrastructure ensures that underperformance can be detected at a granular level. Maintenance such as cleaning, part replacement, or repairs will be conducted through scheduled and responsive maintenance regimes, referenced in Section 6.4.9 of [APP 043] and detailed further in the Outline Operational Management Plan [APP 234]. Access for physical interventions will be facilitated by internal maintenance tracks and unsurfaced service routes, as outlined in Sections 6.4.30–6.4.33 ([APP 043]).
30, 143, 161, 333, 419, 719, 882, 892, 1058	Panel Design: Orientation, Type, and Layout	- The use of horizontally oriented panels may limit opportunities for hedgerow planting and productive land use beneath or between arrays. Vertical arrangements could allow better agricultural integration. - Panel placement on north-facing slopes and areas shaded by woodland may reduce efficiency - Newer technologies, including ultra-thin panels, could improve efficiency and reduce visual impact - Chapter 5 notes a reduction in panel height to 2.3m for landscape reasons; it is not specified if this still supports agricultural use.	The project will use horizontal fixed, ground-mounted PV panels arranged to follow site topography as it is preferred for large scale utility. The layout allows for sheep grazing and small-scale community horticulture beneath and between arrays (Chapter 6: Project Description [APP-043], section 6.4.22; Chapter 17: Agricultural Land Use and Public Rights of Way [APP-054], section 17.4.2). Panels are positioned to optimise efficiency while adapting to site contours, with retained woodland and hedgerows helping to limit shading ([APP-043], section 6.4.21: Chapter 9: Ecology and Nature Conservation [APP-046], section 9.9.109). The layout ensures that the panels are facing south to maximise energy generation efficiency. The Botley West Solar Farm is designed with a flexible framework that accommodates the most up-to-date commercially available photovoltaic (PV) technologies at the time of procurement. ([APP-043], section 6.4.7). The reduction in panel height from 2.5m to 2.3m was made to reduce visual impacts. The design intent remains to support sheep grazing and agricultural use.
1, 33, 48, 104, 139, 174, 183, 184, 220, 252, 274, 318, 319, 342, 360, 383, 412, 456, 457, 478, 487, 690, 714, 722, 728, 729, 748, 778, 860, 888, 893, 912, 958, 996, 1003, 1026, 1073, 1093	Scale and Footprint of the Project	Concerns that the proposed scale of the Botley West Solar Farm—covering over 1,000 hectares and extending 11 miles—is too big and unsuitable for a rural, densely populated area, with concerns that its footprint is driven more by grid intake capacity than by the landscape’s capacity to accommodate it.	Scale and Site Configuration The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The total area within the red line boundary encompasses approximately 1,290 hectares. Of this, 65% (839 ha) is designated for the installation of solar infrastructure, including panels and associated equipment. The remaining 35% of the site supports a diverse mix of uses that contribute to environmental enhancement, access, and site functionality. This includes 81 hectares

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		- The scheme appears fragmented, combining separate land parcels under the classification of national infrastructure. - The buffer zones are perceived to be inadequate, limited visualisation materials. - Additional issues included mapping inaccuracies, unclear masterplans, and missing infrastructure details, which were said to hinder public understanding and scrutiny.	(6.3%) of retained or enhanced hedgerows, 35 hectares (2.8%) allocated for archaeological preservation, and 42 hectares (3.3%) dedicated to maintenance roads to ensure ongoing site accessibility. Additional land uses include 9 hectares (0.7%) for tree planting, 5 hectares (0.4%) of dedicated skylark plots to support local biodiversity, and 2 hectares each for the substation (0.1%) and proposed public rights of way (0.2%). These allocations reflect a carefully considered balance between renewable energy generation and ecological, cultural, and community interests. Delivering a smaller scheme would not deliver the greatest possible benefit from the available land (i.e. the land secured by the Applicant for the Project) and the available grid connection. Designing a scheme which delivers the greatest possible benefit from the available land and grid connection, while respecting local planning and environmental constraints, is consistent with government’s policy as set out in EN-1 and EN-3. Visualisations, Buffers, and Technology Buffers are included to reduce effects on visual receptors, heritage assets, ecological features, and residential amenity, with widths tailored to site-specific sensitivities. The design uses 2.2–2.3 m high fixed panels and visual screening through planting. Examples include: ** 25m from residential properties ** 15m from ancient woodland and Local Wildlife Sites ** 10m from watercourses and hedgerows to preserve ecology Visualisations were produced for 33 of the 55 representative viewpoints that were agreed with the local authorities. Mapping and Information Accuracy Mapping and layout materials were refined through consultation. The masterplan is intended as an illustrative overview to display the general layout of the project within the Order Limits. A set of other plans has been provided alongside the Environmental Statement, each focusing on specific aspects of the project—such as the Operational Development Plan, Temporary Facilities Plan, Site Access Plans, Cable Corridor Plans, and Landscape, Ecology and Amenities Plan. Together, these documents present the full detail of the proposed infrastructure and layout, ensuring clarity. Final information is available in the Illustrative Masterplan [APP-62] and Outline Layout and Design Principles [APP-238].
0709, 0814, 1093	Substation and Grid Connection Infrastructure	- The absence of an integrated Battery Energy Storage System (BESS) is seen as a technical limitation, potentially reducing supply efficiency and stability. - The concerns about grid resilience due to reliance on the Cowley substation and limited consideration of other connection options along the Cowley–Walham corridor.	Absence of On-Site Battery Storage The Project does not include on-site BESS; instead, energy generated will be dispatched to the grid and managed by existing off-site storage facilities, including the EDF 50 MW BESS at Cowley substation (Section 5.8.1, Chapter 5: Alternatives Considered [APP 42]). This approach reflects existing National Grid infrastructure and operational flexibility. Grid Connection and Substation Selection A thorough review of 19 substations was undertaken. Cowley was selected based on available capacity, proximity to land, and grid suitability. National Grid are supportive of the Applicant pursuing this connection at

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			Cowley. Other substations, including Northfleet, were ruled out due to land inaccessibility or greater planning constraints (Section 5.6.7–5.6.9, Chapter 5: Alternatives Considered [APP 42]). The transmission quality and stability of the grid is primarily determined by the quality of the 400 kV overhead line. A 400 kV overhead line with two circuits is highly reliable — if one fails, the other keeps working. The chance of both failing at the same time is extremely low.
2. Agricultural Land Use			
RR-0205-8, RR-0784-1, RR-0103-006, RR-0626-001, RR-1007-003	Change in Use of Productive Agricultural Land	Significant loss of productive arable land for electricity production, the negation of meaningful agriculture due to terminated tenancies, and additional land loss for the substation and Battery Energy Storage System	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicant has sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6). Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8). The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). As stated in paragraph 17.6.32 of this ES chapter, Blenheim Estate comprises a number of diverse farming businesses including a sheep flock of c.1,000 ewes, producing c.1,700 lambs each year and employing two full time shepherds. The Scotch Mule breed of sheep that Blenheim use is suited to extensive and conservation sites with the beef and lamb produced sold locally through the Palace restaurants, local butchers and other regional outlets. Where not grazed, grassland at Blenheim is left to be cut for hay by local farmers or managed as wildflower meadows through their various partnerships to promote biodiversity. This agrivoltaic approach has been adopted in other DCO applications, such as Cleve Hill Solar Park (2020), Little Crow Solar Park (2022), and Sunnica Energy Farm (2024). The commitment to retain agricultural land use is included in the Outline Landscape and Ecology Management Plan [APP-235], secured under Requirement 6 of the Draft DCO [AS-019]. The implications for the loss of agricultural productivity are described in Section 17.6 of ES Chapter 17 Agricultural Land Use and Public Rights of Way [APP-054]. Paragraph 17.6.26 to 17.6.27 explain that “The Defra publication Agriculture in the UK 2023, estimates that domestic wheat production is of the order of 14 million tonnes per year, at approximately 8 tonnes per hectare. On the assumption that approximately 1351.2 ha of the Study Area comprises agricultural land that is used predominantly for arable cultivation, at 8 tonnes per hectare, this would produce in the order of 10,839 tonnes of wheat/annum. The effect of the change in land use to sheep grazing, which would still be agriculturally productive over the

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			proposed 40 year period of operation, would therefore represent a reduction of <0.1% of UK wheat production, based on the Defra statistics.
4, 5, 6, 14, 17, 25, 30, 32, 35, 36, 37, 41, 44, 45, 53, 55, 59, 60, 63, 73, 76, 78, 86, 100, 123, 126, 143, 172, 184, 187, 190, 194, 196, 204, 217, 222, 225, 250, 285, 294, 298, 312, 314, 324, 334, 403, 416, 423, 427, 429, 443, 452, 453, 455, 460, 462, 467, 479, 485, 487, 510, 515, 517, 528, 538, 543, 567, 578, 610, 617, 624, 625, 640, 645, 646, 652, 656, 665, 705, 726, 739, 746, 749, 764, 781, 797, 812, 813, 823, 831, 832, 833, 837, 838, 840, 845, 846, 848, 854, 861, 863, 872, 874, 880, 881, 902, 911, 912, 913, 917, 919, 923, 930, 931, 934, 937, 938, 948, 955, 957, 958, 961, 972, 978, 991, 995, 1000, 1021, 1032, 1033, 1038, 1039, 1040, 1041, 1042, 1052, 1063, 1079, 1085, 1088, 1089, 1092, 1096, 1097, 1099, 1101, 1104, 1113, 1114, RR-0102-002, RR-1108-2,	Change in Use of Productive Agricultural Land	Concerns were raised regarding the geographic extent of agricultural land, including Best and Most Versatile (BMV) agricultural land required to facilitate the Project site.	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicant has sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6). Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8). The Applicant proposes to retain agricultural land use under the solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). This agrivoltaic approach has been adopted in other DCO applications, such as Cleve Hill Solar Park (2020), Little Crow Solar Park (2022), and Sunnica Energy Farm (2024). The commitment to retain agricultural land use is included in the Outline Landscape and Ecology Management Plan [APP-235], secured under Requirement 6 of the Draft DCO [AS-009]. As explained in paragraph 17.9.34 of ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054], only 5.5 ha of agricultural land would be permanently lost during construction of the substations, which is unlikely to significantly impact the viability of the affected farm holdings. Temporary impacts associated with construction of the construction compounds, solar PV panels, cable corridors, and access tracks would not affect the continued operation of the Blenheim Estate (Holding 1) and Holdings 2 and 3 would also remain viable commercial farming businesses and benefit from additional income due to the solar array. With respect to the nine landholdings which coincide with the cable routing for the Project, measures to be included as part of the Soil Management Plan and Code of Construction Practice would ensure farming within these landholdings continues to operate effectively during the construction phase. The Soil Management Plan and Code of Construction Practice would be prepared in accordance with Outline Soil Management Plan [APP-232] and Outline Code of Construction Practice [APP-232], secured under Requirement 11 of the Draft DCO [AS-009]. The implications for the loss of agricultural productivity are described in Section 17.6 of ES Chapter 17 Agricultural Land Use and Public Rights of Way [APP-054]. Paragraph 17.6.26 to 17.6.27 explain that "The Defra publication Agriculture in the UK 2023, estimates that domestic wheat production is of the order of 14 million tonnes per year, at approximately 8 tonnes per hectare. On the assumption that approximately 1351.2 ha of the Study Area comprises agricultural land that is used predominantly for arable cultivation, at 8 tonnes per hectare, this would produce in the order of 10,839 tonnes of wheat/annum. The effect of the change in land use to sheep grazing, which would still be agriculturally productive over the

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			proposed 40 year period of operation, would therefore represent a reduction of <0.1% of UK wheat production, based on the Defra statistics.
84, 104, 218, 263, 276, 464, 683, 1095, RR-1035-3, RR-1007-041.	Concerns About Feasibility of Dual Land Use	Concerns were raised regarding the feasibility of operating a solar development alongside while maintaining agricultural land use during the operation and maintenance of the Project.	The Applicant plans to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas like water meadows by the River Evenlode (ES Chapter 6 [APP-043], paragraph 6.1.4). This includes conservation grazing by sheep and small-scale horticultural production for community food growing groups, supporting Biodiversity Net Gains (BNG). Up to 30 ha will be allocated for community food groups within enhancement areas. This commitment is included in the Outline Landscape and Ecology Management Plan [APP-235], secured under Requirement 6 of the Draft DCO [AS-009]. Low-intensity sheep grazing under, and around solar panels is an effective land management practice, allowing dual use of land for farming and solar development (agrivoltaics). Solar panels will be spaced to ensure sufficient sunlight reaches the vegetation beneath, maintaining healthy grass for grazing sheep. This approach has been adopted in other DCO applications, such as Cleve Hill Solar Park (2020), Little Crow Solar Park (2022), and Sunnica Energy Farm (2024). The ongoing management of the Project site, including further details regarding those responsible for the implementation of sheep grazing, will be agreed with the relevant Local Authorities as part of the detailed Landscape and Ecology Management Plan prior to the commencement of construction. The detailed Landscape and Ecology Management Plan will be prepared in accordance with the Outline Landscape and Ecology Management Plan [APP-235], which is secured under Requirement 6 the Draft DCO [AS-009]. Taking the above information into account, it is considered that low-intensity sheep grazing is a feasible mechanism for retaining agricultural land use within the Project site whilst allowing for continued operation of solar energy development.
208, 288, 292, 342, 551, 574, 596, 631, 671, 714, 729, 904, 910, 939, 961	Disputed Classification of Agricultural Land Quality	Concerns were raised regarding how the Agricultural Land Classification (ALC) of land has been determined and if this was representative of the quality of agricultural land to be affected by the Project.	Agricultural Land Classification (ALC) and soil surveys were conducted according to MAFF guidelines (1988) to assess the quality of agricultural land within the Project site (ES Chapter 17 [APP-054]). The results, detailed in ES - Appendix 17.1 [APP-223], show that 38.35% of the Project site is Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. Some proposed cable routes, comprising about 5% of the Project site, have not been surveyed (ES Chapter 17 [APP-054], paragraph 17.9.12). These areas will be surveyed pre-construction as per the Outline Soil Management Plan (Annex C of the Outline CoCP [APP-232]), which is secured under Requirement 11 of the Draft DCO [AS-009]. The ALC grades distribution informed the assessment in ES Chapter 17 [APP-054], which identified a moderate adverse effect (significant in EIA terms) due to the permanent loss of BMV land, during the Project's lifecycle (Table 17.26 of [APP-223]). A major adverse cumulative effect was also reported (Table 17.27 of [APP-223]). Considering further pre-construction soil surveys, the ALC classification in ES - Appendix 17.1 [APP-223] is deemed accurate and sufficient for assessing the Project's significant effects on agricultural land use reported in ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054].

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105, 148, 161, 182, 192, 251, 281, 287, 303, 346, 363, 533, 545, 554, 560, 565, 635, 730, 785, 786, 786, 815, 885, 899, 984, 1058, 1060	Impacts on Local Farming and Agricultural Livelihoods	Concerns were raised regarding the potential impacts on local farming enterprises because of the loss of agricultural land associated with Project.	As described in paragraph 17.6.17 of ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054], there is approximately 1351.2 ha of agricultural land within the Project site, which is predominantly used for arable cultivation and forms part of 10 known land holdings (ES Figure 17.4 - Land Holdings [APP-111]). As described in paragraph 17.6.27 to 17.6.35 of ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054], most of the land within the Project site is part of the Blenheim Estate (Holding 1), which spans approximately 4,900 ha and is primarily arable land farmed under contract agreements, with some areas on farm business tenancy agreements ending by mid-2025. The estate includes diverse farming businesses, such as a sheep flock and British White cattle for conservation grazing. Holding 2 comprises 55.5 ha of arable land within a larger 285 ha holding. Holding 3 consists of 80.5 ha of arable land within a 215 ha. The remaining known landholdings that are affected by the Project are located where temporary cable routing works may be required. As explained in paragraph 17.9.34 of ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054], only 5.5 ha of agricultural land would be permanently lost during construction of the substations, which is unlikely to significantly impact the viability of the affected farm holdings. Temporary impacts associated with construction of the construction compounds, solar PV panels, cable corridors, and access tracks would not affect the continued operation of the Blenheim Estate (Holding 1) and Holdings 2 and 3 would also remain viable commercial farming businesses and benefit from additional income due to the solar array. With respect to the nine landholdings which coincide with the cable routing for the Project, measures to be included as part of the Soil Management Plan and Code of Construction Practice would ensure farming within these landholdings continues to operate effectively during the construction phase. The Soil Management Plan and Code of Construction Practice would be prepared in accordance with Outline Soil Management Plan [APP-232] and Outline Code of Construction Practice [APP-232], which is secured under Requirement 11 of the Draft DCO [AS-009]. Taking the above information into account and following the implementation of measures to be included in the Soil Management Plan and Code of Construction Practice, ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054] concluded that construction, operation and maintenance and decommissioning of the Project would not result in significant adverse effects with respect landholdings, including the viability of existing farming operations.
24, 64, 67, 72, 77, 89, 101, 115, 116, 121, 128, 129, 136, 139, 141, 145, 150, 153, 162, 173, 189, 198, 207, 214, 218, 220, 229, 233, 235, 237, 240, 241, 243, 246, 249, 252, 255, 256, 257, 260, 269, 272, 277, 286, 296, 299, 309, 317, 331, 333, 341, 351, 355, 364, 378, 380, 386, 388, 394, 395, 404, 414, 424, 426, 434, 441, 446, 447, 448, 451, 459, 463, 474, 478, 482, 490, 496, 498, 499, 504, 506, 508, 512, 518, 520, 521, 531, 532, 544, 549, 552, 558, 561, 563, 564, 573, 575, 580, 585, 586, 589, 591, 592, 593, 598, 599, 611, 627, 637, 638,	Implications for UK Food Supply and Self-Sufficiency	Concerns were raised regarding the geographic extent of agricultural land, including Best and Most Versatile (BMV) agricultural land required to facilitate the Project site and subsequent impacts on the UKs ability to provide food.	The implications for the loss of agricultural productivity are described in Section 17.6 of ES Chapter 17 Agricultural Land Use and Public Rights of Way [APP-054]. Paragraph 17.6.26 to 17.6.27 explain that "The Defra publication Agriculture in the UK 2023, estimates that domestic wheat production is of the order of 14 million tonnes per year, at approximately 8 tonnes per hectare. On the assumption that approximately 1351.2 ha of the Study Area comprises agricultural land that is used predominantly for arable cultivation, at 8 tonnes per hectare, this would produce in the order of 10,839 tonnes of wheat/annum. The effect of the change in land use to sheep grazing, which would still be agriculturally productive over the proposed 40 year period of operation,

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642, 644, 649, 654, 661, 663, 669, 672, 677, 679, 685, 691, 692, 702, 711, 728, 733, 743, 745, 747, 748, 750, 752, 753, 755, 756, 758, 759, 770, 775, 780, 799, 805, 808, 809, 810, 820, 827, 829, 842, 855, 859, 860, 865, 866, 868, 873, 877, 887, 914, 916, 920, 922, 926, 927, 928, 935, 940, 941, 944, 950, 959, 962, 963, 965, 969, 970, 988, 1009, 1011, 1019, 1020, 1026, 1030, 1031, 1065, 1071, 1078, 1087, 1105, RR-1050-008			would therefore represent a reduction of <0.1% of UK wheat production, based on the Defra statistics. It is also notable that the Government Dataset for Agricultural Land Use in the United Kingdom provides historic data on trends in agricultural land use since 2010. This data shows that the total area of agricultural land has remained stable across this period with the utilised agricultural area varying between 70 and 72% of the total area of the UK. The Oxfordshire Food Strategy (2022) identified that approximately 74% of Oxfordshire land area is agricultural being mainly cereals. The total croppable area in the UK has also remained consistently around 6 million hectares. Despite variations in yields from year to year, often affected by weather or market conditions, or the implementation of changes in land use related to individual developments, the cropped area of land has remained stable within the UK. The most recent Defra 2024 Food Security Report also concludes that whilst there has been a small reduction over the long term, the UK is broadly maintaining its level of agricultural land area.
RR-0135-15	Soil disturbance, compaction, and altered soil properties.	Disturbance and damage to soil structure, ground compaction, and changes in soil properties due to the construction, operation, and decommissioning of the solar farm, which may affect the land's return to arable agriculture.	Measures to maintain the quality and viability of soils during construction of the Project, including soil stripping, storage, handling and compaction are set out in the Outline Soil Management Plan, which forms Annex C of the Outline CoCP [APP-232]. Further detail regarding measures to be implemented to maintain field drainage will be set out in the detailed Soil Management Plan, which will be prepared in accordance with the Outline Soil Management Plan (Annex C of the Outline CoCP [APP-232]) and submitted for approval by the relevant local authorities post consent. Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8). As stated in section 9.7 of the Outline Soil Management Plan (Annex C of the Outline CoCP [APP-232]), at the end of the first year of operation, an onsite review would be undertaken to review soil characteristics. During which, any unforeseen changes in soil properties, including structure and moisture content, would be identified and suitable remedial/management measures would be put in place via the detailed Soil Management Plan. With respect to soil decompaction, although the Institute of Quarrying guidance would be referred to, where appropriate, as stated in paragraph 9.5.18 of the Outline CoCP [APP-232]), Whilst these methods could be applied, it is more likely that standard agricultural cultivation would be applied on the land to rectify any small areas of compaction. Typical equipment might include the use of a harrow plus roller, or potentially a subsoiler. Decommissioning will involve removing all infrastructure (excluding certain cables and the NGET substation) according to a Decommissioning Plan, prepared in line with the Outline Decommissioning Plan [APP-236], secured under Requirement 14 of the Draft DCO [AS-009]. Decommissioning will follow similar measures to the Outline Soil Management Plan (Annex C of the Outline CoCP [APP-232]) (ES Chapter 6

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			[APP-043], section 6.5; Table 3.1 of the Outline Decommissioning Plan [APP-236]).
6, 86, 169, 198, 248, 254, 262, 333, 385, 407, 442, 457, 473, 481, 571, 616, 718, 727, 728, 803, 825, 901, 989, 1056, 1077, 1101, RR-0092-025, RR-0092-035,	Long-Term Impacts on Soil and Land Viability	Concerns were raised regarding the potential long terms impacts of the Project on the quality and viability of soils during the construction, operation and maintenance and decommissioning phase.	The only permanent impacts on agricultural land quality and soils will be from the construction of substations and PCSs (ES Chapter 17 [APP-054], paragraph 17.9.5). Temporary impacts from construction compounds, solar PV panels, cable corridors, and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). The Soil Management Plan will be prepared according to the Outline Soil Management Plan (Annex C of the Outline CoCP [APP-232]), secured under Requirement 11 of the Draft DCO [AS-009]. Solar PV modules will be mounted on metal frameworks supported by steel piles or screws, causing temporary soil displacement without soil removal or material mixing (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8). Soil quality will be restored at decommissioning, ensuring no permanent loss of soil function. Decommissioning will involve removing all infrastructure (excluding certain cables and the NGET substation) according to a Decommissioning Plan, prepared in line with the Outline Decommissioning Plan [APP-236], secured under Requirement 14 of the Draft DCO [AS-009]. Decommissioning will follow similar measures to the Outline Soil Management Plan (Annex C of the Outline CoCP [APP-232]) (ES Chapter 6 [APP-043], section 6.5; Table 3.1 of the Outline Decommissioning Plan [APP-236]). Taking the above information into account, except for permanent infrastructure, there will be no long term impacts on soil and land viability associated with construction, operation and maintenance and decommissioning of the Project, including construction compounds, solar PV panels, cable corridors, and access tracks.
170, 180, 884, 895, 897	Trade-Off Between Local Food Production and Emissions	Concerns were raised regarding the potential impact of the Project of UK food production as a consequence of the loss of agricultural land and if this had been suitably considered against the need for renewable energy.	<u>Food Production</u> The implications for the loss of agricultural productivity are described in Section 17.6 of ES Chapter 17 Agricultural Land Use and Public Rights of Way [APP-054]. Paragraph 17.6.26 to 17.6.27 explain that “The Defra publication Agriculture in the UK 2023, estimates that domestic wheat production is of the order of 14 million tonnes per year, at approximately 8 tonnes per hectare. On the assumption that approximately 1351.2 ha of the Study Area comprises agricultural land that is used predominantly for arable cultivation, at 8 tonnes per hectare, this would produce in the order of 10,839 tonnes of wheat/annum. The effect of the change in land use to sheep grazing, which would still be agriculturally productive over the proposed 40 year period of operation, would therefore represent a reduction of <0.1% of UK wheat production, based on the Defra statistics. It is also notable that the Government Dataset for Agricultural Land Use in the United Kingdom provides historic data on trends in agricultural land use since 2010. This data shows that the total area of agricultural land has remained stable across this period with the utilised agricultural area varying between 70 and 72% of the total area of the UK.

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			The Oxfordshire Food Strategy (2022) identified that approximately 74% of Oxfordshire land area is agricultural being mainly cereals. The total croppable area in the UK has also remained consistently around 6 million hectares. Despite variations in yields from year to year, often affected by weather or market conditions, or the implementation of changes in land use related to individual developments, the cropped area of land has remained stable within the UK. The most recent Defra 2024 Food Security Report also concludes that whilst there has been a small reduction over the long term, the UK is broadly maintaining its level of agricultural land area. Emissions The Planning Supporting Statement (PSS) [APP-225], para 2.1.4 sets out the basis for need for solar farms and other forms of low carbon energy infrastructure. The need for all these types of [energy] infrastructure is established by NPS EN-1 (paragraphs 3.3.61 to 3.3.63) and a combination of many or all of them is urgently required both for energy security and Net Zero. Relative efficiency of one form of renewable energy versus another is not a determinative factor in the provision of renewable energy development. Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The urgent need for CNP infrastructure to achieving our energy objectives, together with national security, economic, commercial and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible.
RR-0198-6, RR0339-10	Food security	The key concerns are the potential loss of high-quality agricultural land, impacting food production and security, and the developer's insufficient attention to the loss of Grade 3b land and tenant farmers.	The implications for the loss of agricultural productivity are described in Section 17.6 of ES Chapter 17 Agricultural Land Use and Public Rights of Way [APP-054]. Paragraph 17.6.26 to 17.6.27 explain that "The Defra publication Agriculture in the UK 2023, estimates that domestic wheat production is of the order of 14 million tonnes per year, at approximately 8 tonnes per hectare. On the assumption that approximately 1351.2 ha of the Study Area comprises agricultural land that is used predominantly for arable cultivation, at 8 tonnes per hectare, this would produce in the order of 10,839 tonnes of wheat/annum. The effect of the change in land use to sheep grazing, which would still be agriculturally productive over the proposed 40 year period of operation, would therefore represent a reduction of <0.1% of UK wheat production, based on the Defra statistics. Justification regarding location of the Project site, including the environmental and design constraints considered is presented in ES Chapter 5: Alternatives considered [APP-042]. The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6). Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV

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			modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8). As explained in paragraph 17.9.34 of ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054], only 5.5 ha of agricultural land would be permanently lost during construction of the substations, which is unlikely to significantly impact the viability of the affected farm holdings. Temporary impacts associated with construction of the construction compounds, solar PV panels, cable corridors, and access tracks would not affect the continued operation of the Blenheim Estate (Holding 1) and Holdings 2 and 3 would also remain viable commercial farming businesses and benefit from additional income due to the solar array. With respect to the nine landholdings which coincide with the cable routing for the Project, measures to be included as part of the Soil Management Plan and Code of Construction Practice would ensure farming within these landholdings continues to operate effectively during the construction phase. The Soil Management Plan and Code of Construction Practice would be prepared in accordance with Outline Soil Management Plan [APP-232] and Outline Code of Construction Practice [APP-232], secured under Requirement 11 of the Draft DCO [AS-009].
13, 18, 231, 242, 267, 271, 295, 343, 345, 366, 383, 418, 435, 477, 480, 489, 491, 492, 502, 522, 538, 546, 553, 556, 566, 579, 632, 633, 639, 641, 651, 660, 723, 732, 801, 822, 834, 841, 849, 888, 889, 893, 903, 918, 949, 954, 960, 973, 980, 990, 999, 1003, 1022, 1023, 1025, 1044, 1055, 1007	Use of High-Quality Agricultural Land	Concerns were raised regarding the geographic extent of Best and Most Versatile (BMV) agricultural land required to facilitate the Project site.	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6). Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8). The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). This agrivoltaic approach has been adopted in other DCO applications, such as Cleve Hill Solar Park (2020), Little Crow Solar Park (2022), and Sunnica Energy Farm (2024). The commitment to retain agricultural land use is included in the Outline Landscape and Ecology Management Plan [APP-235], secured under Requirement 6 of the Draft DCO [AS-009]. As explained in paragraph 17.9.34 of ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054], only 5.5 ha of agricultural land would be permanently lost during construction of the substations, which is unlikely to significantly impact the viability of the affected farm holdings. Temporary impacts associated with construction of the construction compounds, solar PV panels, cable corridors, and access tracks would not affect the continued operation of the Blenheim Estate (Holding 1) and Holdings 2 and 3 would also remain viable commercial farming businesses and benefit from additional income due to the solar array. With respect to the nine

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			landholdings which coincide with the cable routing for the Project, measures to be included as part of the Soil Management Plan and Code of Construction Practice would ensure farming within these landholdings continues to operate effectively during the construction phase. The Soil Management Plan and Code of Construction Practice would be prepared in accordance with Outline Soil Management Plan [APP-232] and Outline Code of Construction Practice [APP-232] , secured under Requirement 11 of the Draft DCO [AS-009] .
1007	Change in pattern of agricultural fields	Concerns that the implementation of new hedgerows as part of the project will affect the potential for farming productivity following decommissioning.	The landowners affected by the Project have raised no concerns as the potential to farm the land following decommissioning. The current distribution of field sizes is variable within the Site, with some smaller parcels of between 1.5- 2ha utilised for arable cropping. The decision regarding the preferred use of the land following the decommissioning of the Project would be a matter for the individual landowners based on their farming circumstances at that time.
3. Air Quality			
30 , 58, 64, 89, 217, 279, 292 , 384 , 405, 451, 484 , 520, 521, 770 , 865, 913, 938 , 1019	Additional Air Pollution from Dust and Construction Traffic	Respondents have concerns that there will be increased air pollution from dust and construction traffic.	A full air quality assessment has been undertaken in accordance with all relevant technical, policy and planning guidance, with air quality mitigation measures proposed to reduce environmental effects where they are required. The assessment can be found in Chapter 19 of the main ES reference [APP-056]. This assessment has identified that the Project will not cause any significant adverse effects on sensitive receptors. This assessment includes consideration of pollutant impacts from construction vehicles and a dust risk assessment for the construction phase impacts. The conclusion of the assessment was that there would be no significant impacts from dust during the construction and decommissioning phases or from construction traffic emissions. No significant cumulative residual effects on Air Quality are predicted during construction, operation and decommissioning of the Project. During the construction and decommissioning phases, dust impacts will be controlled and limited by the Outline Code of Construction Practice [APP-232] (CoCP). The CoCP includes an Outline Dust Management Plan, which includes mitigation measures to reduce the dust impact to a level that it not significant. A Statement in respect of Statutory Nuisance under the Environmental Protection Act 1990 [APP-018]. It concludes that the activities and effects generated by the Project across construction, operation (and maintenance) and decommissioning of the Project would not give rise to any claim in respect of statutory nuisance under Section 79(1) of the EPA.
RR-0164-028	Air Quality	CDC has no comments on the matter of air quality at this time.	The Applicant acknowledges this comment from Cherwell District Council.
4. Aviation			
6, 21, 554, 641, 780, 838, 949	Consideration of Emergency Landing and Aviation Safety Zones	The proposal would remove open fields currently available for emergency aircraft landings, particularly near Oxford Airport, where light aircraft have previously used these areas during in-flight emergencies. Replacing these open areas with solar panels will introduce a significant safety risk, and will increase the likelihood of accidents in populated areas.	While these open spaces near Oxford Airport, are not formally safeguarded or designated for aviation use, the Applicant has accounted for aviation safety in the project design. As described in the ES Chapter 5: Alternatives Considered [APP-042], solar panel arrays were specifically removed from land immediately south of Oxford Airport's runway to provide a buffer for potential future landing lights and to enhance operational safety margins (section 5.7.3).

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		This development is eliminating critical safety fallback zones and replacing them with hazards, including potential fire risks in the event of a crash.	In addition, the Appendix 4.4 Glint and Glare Study inc. Technical Aerodrome Safeguarding Response [APP-128] assessed impacts on approach paths and confirmed that the development would not interfere with pilot visibility or present safety risks during take-off or landing. The solar arrays are sited well outside designated safeguarding zones, and the visual and spatial analysis concluded that no mitigation is required due to low risk. The Applicant has agreed to remove sections of the proposed panel area to accommodate London Oxford Airport’s concerns regarding land available for emergency landings. With respect to thermal updrafts, there are no studies or evidence to suggest that solar panels will create significant thermal updrafts that would present a significant impact to the operation of radars. Any potential thermal updrafts resulting from the panels would be lesser than those resulting from the asphalt runways, taxiways and surrounding roads. Indeed there are a number of general aviation airfields with solar panels at the end of or near to the runway that operate safely. Although the concern about eliminating informal emergency fallback areas is acknowledged, these areas are not formally required or protected under aviation policy. Fire risks associated with potential aircraft accidents are addressed through separation distances, and relevant operational risks are mitigated in accordance with standard design and layout principles. The Applicant and Oxford Airport are currently discussing a Statement of Common Ground including a review of; Engine Failure After Take-Off (EFATO) Runway Safeguarded Area, risk of Displacement of Birds and potential for glint and glare impact on the Air Traffic Control Tower (ATCT).
30, 89, 214, 245, 295, 448, 489, 651, 754, 833, 904, 912, 957, 1088	Site Proximity Considerations for Aviation	The solar farm is considered inappropriately sited due to its proximity to Oxford Airport, RAF Brize Norton, and Kidlington Airport, all of which are active training and operational airfields. The scale of the development is viewed as incompatible with nearby aviation activity, particularly given its location under active flight paths. The site's proximity undermines both current airport operations and the long-term viability and expansion of these strategically important facilities.	The siting and layout of the Proposed Development has been shaped by a design process that gave early and specific consideration to nearby aviation infrastructure. As set out in the ES Chapter 5: Alternatives Considered [APP-042], the Site boundary and internal array layouts were adjusted to respect the operational context of Oxford Airport, including the removal of solar panels from land immediately south of the airport’s runway, in order to maintain safe separation and allow for the potential installation of future landing lights (section 5.7.3 [APP-042]). This approach ensured that the Project avoids encroachment into areas that might affect airport safety or future viability. Further design principles are detailed in the ES Chapter 6: Project Description, Table 6.4 [APP-043] which confirms that above-ground infrastructure such as substations, fencing, and camera poles are distributed in a manner that avoids vertical intrusion into safeguarded airspace. The height of infrastructure has been limited across the Project to reduce the risk of obstruction and maintain consistency with aviation safeguarding principles.

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			These considerations demonstrate that the Site's layout has been carefully designed to avoid conflict with established airfield operations. The Applicant has also consulted relevant parties and engagement is ongoing. The Applicant and Oxford Airport are currently discussing a Statement of Common Ground including a review of; Engine Failure After Take-Off (EFATO) Runway Safeguarded Area, risk of Displacement of Birds and potential for glint and glare impact on the Air Traffic Control Tower (ATCT).
76, 86, 148, 184, 263, 337, 386, 407, 474, 632, 655, 660, 685, 752, 911, 919, 929, 934, 1058	Visual Impacts Related to Glint and Glare	The reflections from the solar panels, known as glint and glare, will compromise pilot visibility during critical flight phases such as take-off and landing. These reflections risk interfering with airport lighting systems and cockpit instrumentation. The proposed mitigation measures are insufficiently detailed, and the scale and orientation of the solar arrays will result in persistent visual hazards that have not been adequately addressed or modelled.	A comprehensive assessment has been undertaken, as documented in the Appendix 4.4 Glint and Glare Study inc Technical Aerodrome Safeguarding Response [APP-128], which involved detailed geometric modelling of solar reflections toward key aviation receptors, including the Air Traffic Control (ATC) Tower and the approach paths for runways 01 and 19 (Table 4 Section 7.2.3 [APP-128]). The analysis confirmed that while solar reflections are geometrically possible, these would occur outside a pilot's primary field-of-view and coincide with direct solar radiance, meaning they do not present an additional visual hazard. For the ATC Tower, reflections are partially screened by existing vegetation and built features, and the nearest solar PV panel is located over 1.6 km away (Section 9.1 [APP-128]). These findings are consistent with aviation safeguarding guidance and established industry standards. The modelling also incorporated visibility screening and considered various reflection intensities, ultimately concluding that the development will not interfere with pilot visibility, cockpit instrumentation, or airport lighting systems. Full technical detail is available in the Appendix 4.4 [APP-128]. The Applicant and Oxford Airport are currently discussing a Statement of Common Ground including a review of; Engine Failure After Take-Off (EFATO) Runway Safeguarded Area, risk of Displacement of Birds and potential for glint and glare impact on the Air Traffic Control Tower (ATCT).
143, 194, 340, 388, 455, 485, 509, 579, 588, 649, 887, 917, 938, 950, 988, 1001, 1003, 1023	Aviation Safety Considerations	Plane crash sites will be hard to access, be due to dense fencing and infrastructure. The layout is considered incompatible with the operational and emergency requirements of both civil and military aviation in the area. the potential for increased bird strike risk due to habitat changes, and the danger posed to student pilots frequently flying over the area.	In response to concerns regarding emergency access following a potential aircraft incident, the Applicant has incorporated a safeguarded zone along the extended runway centreline at Oxford Airport. As shown in the Appendix 4.4 Glint and Glare Study inc Technical Aerodrome Safeguarding Response [App-128], this obstruction-free corridor extends approximately 590 metres from the runway threshold, ensuring that in the event of an engine failure after take-off (EFATO), there is both space for aircraft to land and a clear route for emergency response vehicles to access the site promptly . The Project design includes access provisions and setback arrangements that preserve key operational corridors. The Site does not introduce permanent buildings or facilities within Public Safety Zones (PSZs), and only low-density, non-occupied infrastructure (such as solar panels and perimeter fencing) is proposed in these areas, consistent with Department for Transport policy on PSZ land use. On the issue of increased bird strike risk, habitat change effects are unlikely to exceed existing environmental factors, such as nearby roads,

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			infrastructure, and the Oxford Airport business park. These features already produce similar landscape dynamics, which birds, pilots and aviation operations currently manage safely. In relation to training flights, the Applicant’s glint, glare assessment and airspace modelling mentioned above confirms that the Project will not infringe upon Obstacle Limitation Surfaces (OLS) or interfere with aviation instrumentation, ensuring safe overflight and operational conditions for both experienced and student pilots. Further detail is provided in the Appendix 4.4 [APP-128] submitted as part of the DCO application. The Applicant and Oxford Airport are currently discussing a Statement of Common Ground including a review of; Engine Failure After Take-Off (EFATO) Runway Safeguarded Area, risk of Displacement of Birds and potential for glint and glare impact on the Air Traffic Control Tower (ATCT).
18, 243, 252, 255, 394, 466, 522, 601, 602, 627, 744, 801, 819, 860, 906, 908, 910, 958, 1009	Thermal Interference with Air Operations	the potential for solar panels to create thermal plumes—rising warm air currents that could affect aircraft stability and radar accuracy. These plumes are believed to present risks for low-flying aircraft and helicopters and may interfere with the radar systems used for navigation and traffic control at Oxford Airport and RAF Brize Norton.	As detailed in the Appendix 4.4 Glint and Glare Study inc Technical Aerodrome Safeguarding Response [APP-128] it is not anticipated that the solar PV panels would reach temperatures significantly above the surrounding ground level. Importantly, the study also identifies that surrounding infrastructure—including the asphalt surfaces of Oxford Airport’s runway and taxiways, the nearby A44 road, and adjacent commercial areas—already generate thermal updrafts comparable to or greater than those potentially produced by the solar panels. These features lie directly under flight paths, and pilots are routinely trained to manage any resulting turbulence. (Heat-induced Turbulence, page 13, [APP-128]) The analysis concludes that it is not expected to produce turbulence more severe than currently occurs from nearby existing infrastructure. This is a common feature at UK aerodromes, and pilots operating in such environments are expected to be aware of and navigate these conditions safely. The assessment does not indicate that radar interference attributable to thermal plumes would occur at either Oxford Airport or RAF Brize Norton. Further detail is provided in the Appendix 4.4 [APP-128].
248, 268, 268, 446, 810, 814, 913	Potential Radar and Navigation Impacts	The development could interfere with critical radar and navigation systems, particularly those at RAF Brize Norton and Oxford Airport. The solar farm may disrupt radar signals, affect air traffic management, and compromise the operational security of military airspace. The lack of a publicly available independent radar study is a major oversight, it’s a risk that undermines national defence and public safety.	The Applicant has undertaken a detailed assessment of the potential electromagnetic interference from the Project on radar and navigational systems used at Oxford Airport and other local aerodromes, including RAF Brize Norton. The assessment considered a range of radio navigational aids at Oxford Airport, including the Primary Surveillance Radar (PSR), Instrument Landing System (ILS), Distance Measuring Equipment (DME), and Non-Directional Beacon (NDB). (Appendix 4.4 Glint and Glare Study inc Technical Aerodrome Safeguarding Response, Electromagnetic Interference, page 8 [APP-128]) The electromagnetic interference from photovoltaic panels is generally confined to a maximum range of 10 metres, and based on this, existing separation distances to all relevant communication, navigation, and surveillance (CNS) equipment are considered sufficient to avoid interference. As such, no significant operational impact is expected on radar performance or air traffic management functions at Oxford Airport, and no mitigation was recommended by the technical authors of the safeguarding assessment.

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			The assessment follows best practice guidance from the International Civil Aviation Organization (ICAO) and incorporates data from the UK Aeronautical Information Publication (AIP). The results indicate no need for further site-specific radar modelling or military airspace review. Additional consultation and engagement with Oxford Airport informed the conclusions.
350	Noise Impact on Aviation	The placement of solar panels under the take-off path of Oxford Airport could reflect and intensify aircraft noise into nearby villages, effectively amplifying the disturbance experienced by residents. The recent licensing changes at the airport significantly increases aircraft movements, including larger, noisier planes which will further amplify the noise impact.	As stated in the Environmental Statement Chapter 13: Noise and Vibration [APP 050], noise modelling has been undertaken for all phases of the Project, including construction, operation, and decommissioning, with baseline sound surveys conducted at locations representative of the nearest residential receptors. However, the concern regarding amplification of aircraft noise due to potential sound reflection from the solar panels themselves is not substantiated by current acoustic science or by site-specific modelling presented in the ES. Solar panels are not reflective in the acoustic sense—being low-profile structures with matte surfaces designed primarily to absorb light and are not known to materially reflect or amplify sound waves in the way claimed. There is no evidence in wider studies to suggest solar arrays contribute to intensifying aircraft noise in surrounding areas.
5. Cable Routes			
143, 203, 271, 372, 379, 405, 466, 885, 888, 967, 981, 1021	Community and Infrastructure Disruption from Cabling	- Concerns were raised that cabling works associated with the Botley West Solar Farm would cause major disruption to local communities and critical businesses. - Concerns were raised about repeated disturbance along Botley Road and Cumnor Road, and the close proximity of cabling trenches to residential properties, reported as little as 11–15 metres. - It was stated that cabling works could impact existing gas infrastructure and sensitive areas such as Thames crossings. - Siemens Healthineers raised specific concerns about risks to maintaining 24/7 operational access at its Eynsham facility. - Respondents stated that there was a lack of clear comparative analysis between alternative cable routes and incomplete information at the DCO submission stage, limiting community understanding and planning.	Community and Business Disruption Cable routes are aligned with existing highways where possible to minimise disruption, and construction will be phased with traffic management plans in place (Section 5.9.1, Chapter 5: Alternatives Considered [APP 042]). Further, the Applicant has agreed to comply with the 'Oxfordshire Permit Scheme for Road Works and Street Works' to ensure that the local street authority can manage its network. Proximity to Utilities Where cabling passes near sensitive infrastructure, methods such as horizontal directional drilling (HDD) will be used to minimise surface impacts, particularly at Thames crossings and utility interfaces (Section 5.9.2, Chapter 5: Alternatives Considered [APP 042]). Discussions with utilities stakeholders are ongoing to ensure coordination, and appropriate buffer zones have been applied around existing utilities as part of the cable route design. The Applicant is also in discussions with key statutory undertakers, including gas undertakers (such as Southern Gas Networks plc) to agree protective provisions to ensure that gas infrastructure and other forms of utilities apparatus and infrastructure is protected. The Applicant has included protective provisions at Schedule 15 of the draft DCO [AS-009] to secure these protective measures. That schedule includes standard provisions at Parts 1 to 3, as well as bespoke provisions from Parts 4 to 7. Access for Employers Access will be maintained during construction through detailed access management planning, ensuring continuity of operations (Section 5.9.1). Cable Route Alternatives and Information

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			Alternative cable corridors were considered and environmentally assessed. Further design refinement and engagement will continue before final route selection (Sections 5.9.4–5.9.6, Chapter 5: Alternatives Considered [APP-042]). Section 5.9 explains that the cable routes between the three Site Areas will be laid within the defined Cable Corridors. These cable corridors are shown on Figures 2.4a to 2.4c of Illustrative Masterplan [AS-020]. Within those Cable Corridors, there are four locations where alternative cable routes are possible within the wider Cable Corridor. These four locations are shown on Figures 5.1 to 5.5 [APP-119 to APP-122]. Within these four areas the Applicant will, in due course, identify a preferred route within a narrower corridor for the cables. The Applicant continues to undertake further environmental assessment work and analysis and undertake landowner negotiations and technical assessments to allow a preferred cable route to be identified. The need to seek broader powers of compulsory acquisition and temporary possession powers now is to allow the Applicant flexibility to ultimately lay its cable within the most suitable area within that wider corridor, balancing all considerations. The Cable laying Cable Laying Methodology and Indicative HDD Crossing Locations [APP-130] sets out where the anticipates the cables to be laid. Where the Applicant has certainty over the most appropriate location for the cabling, the Applicant is committed to limiting its powers to a narrower width. This is demonstrated through the limited nature of the cable powers within the three Site Areas, as shown by Work No. 4 on the Works Plans [AS-005] where the cable runs tight to the project boundary. In the other areas, additional width needs to be retained within the Order limits to enable refinement of the working area in the event that constraints are identified through the ongoing technical and environmental considerations or through pre-commencement surveys and detailed design.
202, 255, 464, 571, 995, 1034	Routing Near Residential or Sensitive Areas	The plans are noted as not fully detailing how cable routing would avoid sensitive areas such as listed buildings, an Area of Special Scientific Interest (SSSI), and a restored water meadow. Comments also highlight that the plans do not appear to address land allocated for housing in the WODC Local Plan. Some residents suggest that cost considerations may have been prioritized over minimizing residential impacts, by proposing a cable route that passes close to their homes. Reference is made to the DCO Illustrative Masterplan (Figure 2.4C), which indicates that cable corridors and solar panels would extend into environmentally important fields, including Wharf Stream fields connected to Long Mead Meadow, and could affect public green spaces such as the Greenbelt Way riverside path. Routing the cables across the River Thames is viewed as challenging, with the potential to affect	The routing strategy prioritizes locating cables within the existing public highway where feasible, aiming to avoid or minimize effects on sensitive receptors such as residential areas and ecologically significant sites (chapter 5: Alternatives Considered [APP-042], section 5.9.1 / page 11). Where routing across sensitive features is necessary, such as the River Thames, a Horizontal Directional Drilling (HDD) technique will be used to avoid surface disruption. This approach is specifically proposed for crossings at the Thames, tree/hedgerow boundaries, and selected roads ([APP-042] section 5.9.2 / page 11). At the Swinford Bridge area, the options considered propose the use of HDD to cross under the River Thames and associated floodplain meadows. The different options vary slightly in their paths across agricultural fields and hedgerows but consistently aim to limit physical impacts (chapter 9: Ecology and Nature Conservation [PDB-008], section 9.7.14–9.7.22 / page 68). Specific environmental safeguards are in place for sensitive water bodies. At river crossings like the Thames, HDD entry and exit points will be set at least 8 meters back from riverbanks, and the cables will be installed at a minimum depth of 2 meters below the riverbed, to be agreed upon with

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		listed buildings, protected habitats, restored water meadows, and public footpaths. Additional observations note that the cabling would pass close to the Ancient Woodland of Wytham Wood, an area of high biodiversity value.	regulatory authorities (chapter 10: Hydrology and Flood Risk [APP-049] Table 10.26, section 10.4 / page 67). Regarding residential impacts, there is recognition that some cable corridors may pass close to housing, particularly near Eynsham. Route selection seeks to balance engineering feasibility, environmental impact and minimization of impacts to residents ([APP-042] section 5.9.5 / page 11). In relation to ecologically sensitive areas, when crossing near the Ancient Woodland of Wytham Woods (a Site of Special Scientific Interest), the project will trench the cables within the existing (public highway, B4044) to avoid direct impacts ([APP-046] section 9.9.18 / page 76). As for heritage concerns, the project acknowledges the proximity to the Grade II* listed Swinford Toll Bridge, and HDD is proposed to avoid direct or indirect effects on the bridge or its historic setting (chapter 7: Historic Environment section [CR1-003] 7.3 / page 17). Finally, the cable corridor near Eynsham extends toward areas like the Wharf Stream fields and Long Mead Meadow, which are of biodiversity importance. The routing through this area has been designed with embedded mitigation strategies to minimize impacts (chapter 2: Existing Baseline [APP-039], section 2.6.1 / page 6).
324, 334, 471, 782	Request for Detailed Routing Information	Cable routing plans and details on associated environmental and infrastructure impacts are not yet fully defined.	The cable system has been evaluated for optimum route and method of laying with the aim to avoid or minimise environmental impact (Chapter 5: Alternatives Considered [APP- 042] (Section 5.9.1)). The preferred method is cut and cover trenching, with horizontal directional drilling (HDD) or pipe ramming used where sensitive features are present, including at the Thames crossing near Swinford Bridge, the railway line, tree hedgerow boundaries, and several roads [APP- 042] (Section 5.9.2). The cable routes between the Site Areas will be laid within the defined Cable Corridors, as shown in Figures 2.4A to 2.4D [AS-020]. The preferred route within these areas will be confirmed following further legal, design, and engineering investigations after submission, alongside updated environmental information [APP-042] (Section 5.9.6)
63, 218	Safety Case	• Safety risks of cables installed close to existing utilities and residential areas. • Potential transmission losses due to the length of high-voltage cables.	The cable routing design considers interactions with existing utilities and sensitive features, including roads, residential areas, and the Thames crossing. The method of cable installation has been selected to minimise risks through the use of cut and cover trenching where appropriate, and horizontal directional drilling (HDD) or pipe ramming at sensitive locations such as the Thames crossing, railway lines, roads, and tree hedgerow boundaries (Chapter 5: Alternatives Considered [APP 042], (Section 5.9.1 and 5.9.2)). Discussions with utilities stakeholders are ongoing to ensure coordination, and appropriate buffer zones have been applied around existing utilities as part of the cable route design. The Applicant is in discussions with key statutory undertakers to agree protective provisions to ensure that utilities apparatus and infrastructure are protected. The Applicant has included protective provisions at Schedule 15 of the draft DCO [AS-009] to secure these protective measures. That schedule includes standard provisions at Parts 1 to 3, as well as bespoke provisions from Parts 4 to 7. The Main Project Substation, as described in Chapter 6: Project Description [APP 043], is designed to manage and regulate voltage

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			levels to support efficient transmission and minimise energy losses. The design approach reflects standard practice for high-voltage infrastructure where power losses over cable distances are managed through appropriate system design.
61, 148, 155, 159, 169, 172, 176, 177, 178, 182, 191, 192, 196, 200, 202, 208, 210, 211, 213, 264, 313, 343, 482, 814	Environmental and Landscape Considerations	Concerns are raised that overhead cabling would contribute to an industrial appearance in the landscape. It is suggested that underground cabling is preferable to minimize landscape impacts. Comments note that rare water meadows and nature reserves near the River Thames could be affected by cable installation, with potential for soil compaction and disruption to sensitive drainage systems. Specific concerns are also expressed about the proposed cable route along the east side of the B4017, where a suggested alternative could reduce effects on nearby houses, offices, and woodland ecology.	The Botley West Solar Farm project proposes that all electrical cables will be laid underground. Trenchless methods like Horizontal Directional Drilling (HDD) will be used to cross sensitive features such as rivers, hedgerows, and ecologically significant areas. (Chapter 6: Project Description [APP-043] section 6.3.7 / page 10). The choice to use HDD or pipe-ramming in crossing sensitive environments is intended to avoid or minimize disturbance to important landscape features, including rare water meadows and river meadows near the Thames, and to protect the balanced drainage systems that these habitats depend upon (Chapter 9: Ecology and Nature Conservation [APP 046PD-008] Table 9.8.1: section 9.10 / page 71). Regarding cable routes along roadways such as the B4017, the environmental statement notes that cables will be routed to balance engineering, environmental, and land ownership considerations, and where possible, use existing infrastructure corridors to avoid new landscape fragmentation ([APP- 043], section 6.1.9 / page 3). Finally, localized visual effects during construction and underground cabling are designed to be minor and are not considered significant in the context of Environmental Impact Assessment (EIA) standards (chapter 8: Landscape and Visual Impact Assessment [APP 045], section 8.9.20 / page 87).
RR-0164-030 (Cherwell District Council)	London-Oxford Airport	Aviation Activities CDC are aware of a number of concerns from London-Oxford Airport about impacts on aviation relating to: • Glint and glare; • Thermal plumes affecting radar and causing turbulence; • Firefighting response within 1km of the airport; • Electromagnetic Interference (EMI) which could affect communication and navigation; • Increased risk of bird strike and collisions with animals caused by birds mistaking solar arrays for lakes and wildlife being displaced from areas with panels; Whilst an assessment of Glint and Glare has been carried out and a number of mitigations have been recommended as a result, all these matters will need to be appraised during the examination.	Pager Power has produced a Glint and Glare Study and a Technical Aerodrome Safeguarding Report considering any potential impacts from glint and glare, thermal plume, turbulence, and electromagnetic interference. It is not within Pager Power's expertise to comment on the firefighting response nor risk of bird strike, but these are considered elsewhere within the RR responses under the Fire Safety and Ecology Sections. On the issue of increased bird strike risk, habitat change effects are unlikely to exceed existing environmental factors, such as nearby roads, infrastructure, and the Oxford Airport business park. These features already produce similar landscape dynamics, which birds, pilots and aviation operations currently manage safely.
6. Climate Change			
0024, 0058, 0063, 0217, 0254, 0270, 0292, 0303, 0333, 0343, 0383, 0423, 0424, 0457, 0499, 0501, 0518, 0522, 0566, 0567, 0691,	Carbon Payback and Lifecycle Assessment	There has been no full lifecycle assessment of the net carbon emissions reduction/increase of the project. This includes construction, transportation,	The climate change chapter (Volume 1 Chapter 14 (APP-051)) submitted in support of the application confirms in paragraph 14.5.17 that "GHG emissions associated with a proposed project are often reported as a whole

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0786, 0798, 0822, 0882, 0963, 0969, 0999, 1003, 1019. 1026, 1058, 0855, 0872, RR-0339-8, RR-0791-005		operation and maintenance and decommissioning of panels. Botley West may never pay back the carbon debt it accumulates in construction and removal; there is a huge amount of carbon generated just in the production of the panels.	life figure (net emissions) that takes account of all stages of the Project. The net whole life figure is the key element for determining the Project’s whole life impact on climate change. Due to the nature of GHG emissions, it is good practice to include a section that reports on the whole life GHG emissions associated with the Project, alongside the sections that assess construction, operation (including panel and material replacement), and decommissioning effects in isolation. This approach has been taken for the purpose of the climate change assessment (Volume 1 Chapter 14 (APP-051)). It has been noted in the climate change chapter (Volume 1 Chapter 14 (APP-051)) Table 14.9 that replacement of PV modules and Inverters will occur once during the operational lifespan of the Project. This has been informed by Environmental Product Declarations for the modules and inverters assumed operating lifetime of 25 years. The whole project (net effects) assessment is made on the basis that the Project will displace higher-emitting energy sources that would have continued in the business-as-usual baseline, whilst also considering projected future energy scenarios. This has been calculated using both the current grid average carbon intensity of generation (DESNZ, 2024), and the long run marginal projection from DESNZ (2023), treating the former as remaining consistent in the future baseline without the Project, and the latter as a robustly calculated estimation of the pathway the UK national grids carbon intensity will move towards, if projects such as the Project continue to be consented and implemented in line with UK policy aims for renewable deployment. The whole-life GHG emissions (total construction-stage, operational-stage, and decommissioning-stage emissions) resulting from the Project is shown in Table 14.16 of the climate change chapter (Volume 1 Chapter 14 (APP-051)). This is shown alongside the anticipated carbon payback period for the Project which would be from 6 years of operation.
0243, 0322	Discussion of National vs Global Climate Impact	Issues around the impact on global warming from other countries and imports.	As is detailed within the IEMA (2022) GHG in EIA Guidance all developments that emit greenhouse gas (GHG) have the potential to impact the atmospheric mass of GHGs as a receptor, and so may have a cumulative impact on climate change irrespective of geographic location. Consequently, cumulative effects due to other specific local development projects cannot be individually identified and assessed. When evaluating the impact of the Project the atmospheric mass of GHGs has been defined as a high sensitivity receptor. This approach is consistent with the IEMA (2022) GHG in EIA Guidance. The climate change chapter (Volume 1 Chapter 14 (APP-051)) has detailed that the majority of the construction-stage GHG emissions associated with the manufacturing of components is likely to occur outside the territorial boundary of the UK and hence outside the scope of the UK’s national carbon budget and approval scope of the Secretary of State for the purpose of this application. However, in recognition of the climate change effect of GHG emissions (wherever occurring) and the need, as identified in national policy, to avoid ‘carbon leakage’ overseas when reducing UK emissions, the full life-cycle GHG emissions of the Project have been evaluated when determining the significance of effects. This is consistent with the requirement to consider all relevant indirect effects which might give rise to potential significant effects.

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0089,0117, 0248, 0497, 0618, 0641, 0658, 0702, 0747, 0979, 1077, RR-0135-11, RR-0784-11, RR-0134-004, RR-0134-011, RR-1050-003	Resilience of Infrastructure to Climate Events	Concern over how robust the design of the Project will be to climatic events such as storms, tornadoes and extreme heat.	Increased ambient temperatures as a result of climate change were scoped out as the manufacturing standards for PV modules IEC TS 63126:2020, IEC 62548 and IEC 61215-1:2021 require modules to be functional over a wide range of temperatures, humidity and UV radiation. As such, the potential for small system efficiency losses due to hotter temperatures during the Project's lifetime are not considered to have any potential to significantly affect the lifecycle GHG emissions and thus significantly reduce the environmental effect of the renewable electricity generation. Table 14.6 of the climate change chapter (Volume 1 Chapter 14 (APP-051)) confirms additional detail on the justification in line with the planning inspectorate's comment on scoping (Table 14.6 of Volume 1 Chapter 14 (APP-051)). Extreme weather events such as storms with high winds are also possible in the existing and future baseline and the Project's design will need to account for this. Manufacturing standards for PV modules (listed above) require consideration for extensive weathering (such as from hailstorms) and extreme thermal fluctuations. As such, extreme weather events are not considered to cause significant environmental effects to the Project. The climate change chapter (Volume 1 Chapter 14 (APP-051)) has considered the effect of greenhouse gas (GHG) emissions caused directly or indirectly by the Project, which may have the potential to contribute to climate change. GHG emissions have a global impact rather than directly affecting any specific local receptor to which a level of sensitivity can be assigned. The global atmospheric mass of the relevant GHGs and consequent warming potential, expressed in CO₂e.
0067, 0208, 0252, 0346, 0613, 0676, 0737, 0745, 1065, 1067	Suitability of Location and Strategy	the plan to use Solar in west Oxfordshire is that there is nothing about this region that makes it stand out as a particularly good location in the UK to capture the sun. Advocate more use of wind and tidal power as well as deployment of mini nuclear reactors	The Planning Supporting Statement (PSS) [APP-225], para 2.1.4 sets out the basis for need for solar farms and other forms of low carbon energy infrastructure. The need for all these types of [energy] infrastructure is established by NPS EN-1 [paragraphs 3.3.61 to 3.3.63] and a combination of many or all of them is urgently required both for energy security and Net Zero. Relative efficiency of one form of renewable energy versus another is not a determinative factor in the provision of renewable energy development. Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The urgent need for CNP infrastructure to achieving our energy objectives, together with national security, economic, commercial and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.
0086, 0104, 0362, 0393, 0611, 0659, 0909, 1097, 1097	Support for Climate-Focused Development	The climate emergency requires rapid and large-scale deployment of clean energy generation so in principle I support the Botley West Solar Farm (BWSF) proposal.	Noted.
7. Community Benefits and Impacts			
20;24;25;27;28;40;47;69;82;95;107;123;132;161;165;197;209;211;232;227;238;272;290;291;292;301;307;362;369;384;387;393;436;445;449;471;521;527;530;560;576;611;636;644;653;659;661;662;694;734;745;786;844;956;975;1027;1028;1054;1079	Community Benefit Fund	Respondents are concerned at the size of the fund and believe that it does not reflect the size of the development or match funds linked to projects in Scotland, where £5000 per MW is usual. Many feel that it does not compensate residents for the impacts of the Project.	The Applicant acknowledges the concerns and notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant. The fund will be part of a Community Benefits package outside the scope of the DCO application, to be agreed with the relevant local authorities. (See Planning Supporting Statement paragraphs 3.5.24 and 8.4.71 APP/7.1). The Applicant has held discussions with Parish, District and County Councils and has now agreed to an annual fund payment of £525 per MW, £441,000. This will deliver £16,5000,000 over the

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			37.5 year life of the project, before indexation. The Scottish figure of £5000 per MW is applicable to onshore wind turbines, not solar farms.
3, 13, 18, 24, 25, 38, 44, 55, 61, 70, 93, 100, 104, 105, 115, 119, 121, 136, 137, 145, 155, 165, 182, 189, 199, 200, 202, 208, 210, 213, 217, 221, 235, 239, 248, 255, 256, 276, 280, 283, 285, 287, 290, 297, 300, 314, 329, 330, 333, 334, 342, 343, 345, 353, 355, 363, 378, 383, 394, 397, 401, 407, 414, 416, 429, 433, 435, 449, 456, 460, 461, 468, 487, 488, 490, 492, 495, 496, 502, 504, 509, 514, 521, 522, 536, 538, 539, 550, 561, 571, 573, 585, 596, 612, 617, 619, 620, 621, 624, 625, 631, 632, 634, 635, 644, 676, 685, 711, 726, 727, 742, 746, 747, 753, 754, 772, 797, 798, 803, 812, 814, 818, 819, 822, 830, 832, 833, 834, 847, 851, 858, 859, 863, 868, 872, 876, 885, 886, 891, 899, 912, 913, 915, 920, 924, 926, 930, 937, 941, 945, 948, 949, 951, 952, 953, 954, 961, 966, 972, 974, 989, 992, 995, 996, 999, 1003, 1004, 1013, 1015, 1019, 1021, 1022, 1023, 1026, 1031, 1038, 1047, 1056, 1058, 1059, 1060, 1061, 1062, 1063, 1071, 1077, 1079, 1082, 1105, 1106, 1113	Impact on local villages and residents	Respondents see the size of the Project and its proximity to villages as an unwanted impact, challenging their way of life and bringing no tangible benefit. They see the electricity going to the National Grid, the revenue to the Applicant and landlords, with no benefit for residents. Respondents see negative effects on wellbeing, lifestyle and house prices.	The Planning Supporting Statement [APP-225] sets out the Applicant's case and summarises the conclusions reached in the Environmental Statement. Section 3.3, Environmental Acceptability, describes the effects of the project during construction, operation, maintenance and decommissioning phases. For Heritage, Landscape and Visual Impact, Ecology, Traffic and Transport, Noise and Vibration and Air Quality the conclusion is that there will be no likely significant effects arising from the Proposed Development. Chapter 16 of the Environmental Statement, Human Health (APP-053), concludes that there will be no significant adverse effects on human health during the four phases of the Project. Table 16.30 is a summary of potential environmental effects, mitigation and monitoring, assessing the effect of all aspects of the Project. Chapter 9 Ecology and Nature Conservation [APP-046] lists 12 beneficial effects through habitat creation on hedgerows, waterbodies, breeding birds, bat species, ancient woodland and dormice. Table 9.8.1 sets out the mitigation measures that will be secured as a requirement of the DCO, including 70% Habitat Biodiversity Net Gain. The Outline Landscape and Ecological Management Plan (oLEMP) details ecological enhancements including bee hives, log piles and bird boxes, avoidance of impacts to Oxford Meadows SAC, mitigation planting, 36 ha new meadow areas, protection of bat flightlines, 5 ha new woodland, 26.5km new species-rich hedgerow on the Project site. Areas of buried archaeology will be managed as wildflower meadow, habitat for wintering and breeding birds. Species-rich grassland will ensure cover for nesting birds such as skylark. Chapter 15, Socio Economics [APP-052] describes the Project's effect on unemployment levels: construction will create up to 17,472 person years of direct and indirect employment, with investment of £1.05 billion into the local economy. 3500 sheep will graze the site, a gross value-add of £4.8m. No significant adverse effects are found. Table 15.26 describes the effects on unemployment, skills, traffic, noise, travel patterns and the visitor economy. The Outline Skills and Employment Plan, Appendix 15.2 [APP-218] describes the approach the Project will take to increase employment and opportunity, encourage apprenticeships and skills training, promote STEM in schools. It explains the substantial economic benefits that the Project will bring and how the Applicant will maximise these benefits for the local community. Chapter 14 Climate Change [APP-051] Table 14.12 shows that the Project will generate 29,276,880 MWh during its 37.5 years of operation. By displacing fossil-fuel generation, this will save 7,547,508 tCO ₂ e.
8. Community Food growing Location			
74; 85; 146; 203; 248; 393; 399	Community food growing locations	Setting aside areas for community food growing is praised, as is the involvement of the Cherwell Collective in the initiative. Where is the land coming from, will there be sheep and concerns raised about food security.	Areas of the Project site have been reserved for community food growing: these are shown on plan 7.3.3 - Landscape, Ecology and Amenities [APP-228]. Memoranda of Understanding have been signed with Cherwell Collective and Christopher Goodall to deliver community food growing initiatives, teaching food growing skills and supplying food to local food poverty alleviation organisations such as the Cutteslowe Larder. Conservation grazing of sheep will be used to keep grass down around the panels and for biodiversity. The Applicant is working with the Oxford Food Network and Oxford Farm to Fork to encourage more food growers to join the scheme. The Applicant notes the concern about food security. Chapter 17 Agricultural Land Use (APP-054) concludes that the permanent loss of BMV

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			land is contained to a small area and is not considered significant in EIA terms. The Government has determined that solar PV generation is critical national priority infrastructure. Paragraph 3.5.8 of the Planning Supporting Statement, (APP-225) describes the shortfall of planned and built solar PV generation against the Government's 2035 target, emphasising the importance of Botley West's 840MW and confirmed grid connection offer.
Consultation Process			
1; 31; 70; 86; 105; 124; 139; 190; 248; 329; 338; 360; 386; 388; 434; 443; 446; 447; 474; 479; 491; 504; 526; 535; 611; 619; 641; 798; 869; 894; 923; 939; 959; 973; 1022; 1113; 1114	Adequacy of Consultation		The Applicant acknowledges this comment but confirms that the level of consultation undertaken, and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in the Consultation Report [APP-024] and confirmed in the Acceptance checklist (s55) [PD-001] and Notification of Decision to Accept Application [PD-002] ., which was submitted to the Planning Inspectorate and accepted for examination.
7; 161; 208; 217; 227; 252; 255; 267; 292; 297; 313; 329; 343; 354; 362; 394; 410; 458; 468; 481; 547; 553; 592; 595; 610; 620; 631; 641; 649; 714; 730; 765; 814; 888; 890; 899; 908; 910; 917; 919; 926; 939; 945; 949; 973; 1022; 1023; 1029; 1068	Applicant's consideration of feedback	The Applicant has not listened to responses on the Project from members of the community and/or local organisations.	The Applicant acknowledges this comment but confirms that the level of consultation undertaken, and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in the Consultation Report [APP-024] and confirmed in the Acceptance checklist (s55) [PD-001] and Notification of Decision to Accept Application [PD-002]., which was submitted to the Planning Inspectorate and accepted for examination. For example, as described in Chapter 2 [APP-024], the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development. Chapter 7 [APP-024] describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Tables 6.1 – 6.6 set out the comments received from authorities on the Applicant's approach to consultation and how the Applicant has had regard to these in developing the Scheme. Table 6.7 in Chapter 6 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation. Chapter 8 [APP-024] describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary (NTS) was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme. Chapter 11 of the Consultation Report [APP-24] describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by Appendix 033 - Section 47 Applicant Response [APP-033].
268; 286; 310; 384; 466; 535; 574; 711; 727; 798; 833; 920; 926; 939; 1001; 1009	Quality and balance of consultation materials	The consultation materials were unclear, hard to read, inaccessible due to their individual size/detail, or misleading to poorly inform the community during consultation.	The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in 5.1 Consultation

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			Report [APP-24], which was submitted to the Planning Inspectorate and accepted for examination. Through an iterative process of two community consultations, and two targeted consultations, the Applicant has committed to developing and further refining their plans at every stage. The Applicant also made these materials readily available as they were published and consulted on via the Project Website, the distribution of key information to CAP Sites (identified in Chapter 7 of the Consultation Report – [APP-24]), and accommodating materials requests made through the Project Communication Channels (identified in Chapter 7 of the Consultation Report – [APP-24]). These materials requests included but were not limited to providing digital copies of the entire Application including every available document and providing individual documents via post when hard copies were specifically requested. These consultation materials are available to view in Appendix 026: Appendix 026: Phase One Community Consultation Materials - [APP-026], Appendix 029: Phase Two Community Consultation Materials - [APP-029], and Appendix 032: Targeted Consultation Materials [APP-032].
71; 316; 535; 798; 960; 1003	Developer responsiveness including requests for project updates		The Applicant has ensured to communicate project updates via the Project Website, postcards, email, and the publication of notices in local and national newspapers. The Applicant also has regularly notified their 'keep informed list' of residents and stakeholders who signed up regarding updates on the Project. The Applicant encourages anybody who wishes to be kept informed with the Botley West Solar Farm project to sign up for project updates via post and/or email on the Botley West Solar Farm Project website. The Applicant also recommends that the Party utilises the Planning Inspectorate's "Email Updates" service, as can be accessed from the Planning Inspectorate's Botley West Solar Farm home page.
322	Engagement with notable organisation	The Applicant did not consult the British Horse Society (BHS) despite this being requested in Phase One Consultation.	The Applicant consulted the British Society as part of the Phase One consultation. The BHS submitted a response to the consultation on 7 December 2022.
982	Engagement with notable organisation	Our community solar farm has lessons to teach new solar farms. The developers of Botley West have consulted with us and made on-site visits.	The Applicant notes this comment.
1028	Engagement with non-statutory bodies	Travel. Cycle routes and footpaths connectivity, we recommend that you consult with local cycling organisations, groups and the Village Travel Network https://www.vtn.org.uk and welcome upgrade of existing footpaths and introduce new routes/paths.	The Applicant notes this comment. Throughout the pre-application period, the Applicant consulted a number of non-statutory bodies with an interest in cycling, including Cycling UK Oxfordshire.
523	Consultation materials/documents	Local resident wants to understand more about the proposals before being able to conclude whether they support it.	The Applicant maintains all consultation materials on the Project website: www.botleywest.co.uk. The Applicant has also kept open the Project communications channels throughout the consultation and application process to provide any information regarding the Project stage or any information generally regarding the Project. The Applicant encourages anybody who wishes to be kept informed with the Botley West Solar Farm project to sign up for project updates via post and/or email on the Botley West Solar Farm Project website.

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			The Applicant also recommends that the Party utilises the Planning Inspectorate's "Email Updates" service, as can be accessed from the Planning Inspectorate's Botley West Solar Farm home page.
9. Cumulative Impacts			
1052	Infrastructure Capacity in Context of Regional Growth	The cumulative impact of high-density development is causing a strain on infrastructure and utilities in West Oxfordshire.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] . This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. Through the cumulative assessment completed, an assessment of local infrastructure capacity has been undertaken.
161, 229, 366, 611, 616, 718, 745, 1031, RR-0793-003, RR-1086-17 [VWHDC]	Future Cumulative Effects	Other solar farms, in addition to potential supporting infrastructure related to Botley West, are going to be developed in the future. The Applicant has not acknowledged this and the cumulative impact these will cause.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] . This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. Any future developments will carry out their own cumulative assessment, and, as such, they will be appropriately assessed against cumulative schemes when they come forward.
919, 1021	Inter-related Effects	The anticipated effects caused by Botley West should be assessed together and not only be treated as isolated issues.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] . This chapter includes an assessment of inter-related effects, which assesses how individual effects may combine to create inter-related effects on identified receptor groups.
303, 327, 343, 690, 898, 1010, RR-0092-005, RR-0092-028, RR-0098-013, RR-0315-2, RR-0339-11, RR-1076-004, RR-1086-17 [VWHDC], RR-1108-10	Approach of Cumulative Assessment	The cumulative assessment has not considered certain schemes that should have been assessed.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] . This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment and selection of cumulative schemes with statutory and non-statutory consultees. The Applicant deems the approach taken to the cumulative assessment that has been carried out as being suitable and appropriate for the proposed development.
998, RR-1102-3 [WODC]	Continuous Cumulative Impacts along PROWs and Roads	Some PROWs have a viewpoint at one end only, therefore ignoring cumulative impacts. The same applies to the assessment of cumulative impacts on roads.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] . This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. The Applicant deems the approach taken to the cumulative assessment that has been carried out as being suitable and appropriate.
189, 334, 360, 520, 571, 786, 995	Cumulative effects relating to Growth Areas in Local Plan	The cumulative assessment should be assessed in conjunction with Strategic Development Areas and Strategic Locations for Growth contained in the Local Plan.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] . Strategic Locations for Growth and Strategic Development Areas have been assessed as appropriate, following consultation with statutory and non-statutory consultees.
246, 292, 577, 589, 986	Cumulative Change to Agricultural or Rural Land	Cumulative impacts causing effects specifically as a result of the local area being rural and agricultural.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] . This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. Through the

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			cumulative assessment completed, an assessment of the cumulative effects on surrounding rural and agricultural land has been undertaken.
854	Cumulative effects relating to Government Growth Plan	The incompatibility of Botley West with the recently announced UK Government Growth Plan, which includes development in and around Oxford.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] . This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. The Planning Supporting Statement also identifies the relevant local and national policy [APP-225] .
RR-0102-015 Bladon Parish Council	Omission in Figure 19.1 Cumulative Developments	In response to the EIA Scoping Opinion, BPC asked that the developer produce a map to show all of the proposed developments in the surrounding area of the development. These maps have been provided but it appears that Figure 19.1 Cumulative Developments – Overview does not include the sites shown on Figures 19.2 and 19.3, which show the Cumulative Developments for Cherwell and Vale of the White Horse and Oxford. This omission means that the full impact of the developments is not illustrated, for example, it does not show the ribbon of development starting at Wolvercote Roundabout and going along most of the A44 into Woodstock. Refer to the map in Annex B which illustrates the ribbon of development. Table 19.7 in Chapter 19 of the PEIR states that there has been no cumulative effect identified for most of the categories in the table including Landscape and Visual Resources, Ecology and Nature Conservation and Agricultural Land Use and Public Rights of Way. BPC would like to understand how once built, the developments in Eynsham, Begbroke and Yarnton, which will be surrounding the proposal and will remove huge areas of land that are currently shown on the plans as open countryside, does not create a cumulative effect on the landscape, ecology, agricultural land or PRoWs.	The ES contained within the application submission considers Cumulative Effects and Inter-relationships at Chapter 20 [APP-057] and Appendix 20.1 [APP-224] and the relevant projects are identified in Figures 20.1 (West Oxfordshire) [APP-116], 20.2 (Cherwell) [APP-117] and 20.3 (Vale of White Horse and Oxford City) [APP-118]. The latter also contains an Oxfordshire County Council led flood alleviation scheme in Hinksey Meadows. The above information contains the relevant Tier 1, Tier 2 and Tier 3 projects, including housing allocations and applications between Oxford and Woodstock, and was correct at the point of submission, following regular reviews of the baseline with the host authorities, and worked through from a long list to a shortlist and undertaken in line with the PINS advice note on cumulative assessment. The cumulative effects of schemes, including the effects on landscape, ecology, agricultural land and PRoWs, is reflected in the assessments contained within individual topic chapters. These tables and maps do not contain existing built development, which Bladon Parish Council also seems to suggest is part of the ‘cumulative’ assessment of effects, in referring to the ribbon of development from Wolvercote Roundabout to Woodstock. To confirm, the three submitted cumulative development figures contain Fig. numbers in their title blocks which should say ‘20.#’ and not ‘19.#’ - this is an errata.
10. DCO Process			
13	n/a	There are several areas in which the application is incomplete, including statements to the effect that decisions have not yet been made. In particular, the necessary crossing of the Thames for cabling has not been included, and all suggested routes have very serious ecological problems.	The Non-technical Summary [APP-037] and the Explanatory Memorandum [AS-011] explain the parameters of the DCO, within which the matters of detailed design will be developed. The DCO provides a range of mechanisms for these matters of detail to be secured later, the environmental effects of which have been assessed on a “worst case” scenario design envelope (referred to as the Rochdale Envelope). This allows the Applicant to determine matters such as the final cable route, by assessing effects within the whole cable route corridor where cables can potentially be placed. This allows the configuration of various Project components to be finalised at a later stage, in a manner most appropriate for the delivery of the Project while still managing environmental effects. The Horizontal Directional Drilling (HDD) method is being used to avoid any excavation or disturbance to the river, its banks, or nearby floodplain habitats, significantly reducing ecological impact. The cable corridor was

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			also adjusted to avoid sensitive meadows west of Swinford Bridge, using land to the east instead. Ecological considerations, including aquatic and riparian habitats, have been fully assessed and are being carefully managed. The final cable option preference for the Thames crossing point will be advanced through the Examination period.
49	n/a	I object on the basis that this is in reality not a single project but several discrete ones that have been lumped together to make them appear as National Infrastructure status and so bypass the local democratic planning processes.	Under section 31 of the Planning Act 2008, Nationally Significant Infrastructure Projects are required to be consented through a DCO. For Utility Scale Solar projects, such as the Proposed Development, if more than 50 Megawatts capacity is being generated it is captured as a Nationally Significant Infrastructure Project. On that basis, it would not be possible for the Applicant to seek consent for the Project through any other consenting process, such as the Town and Country Planning Act 1990. Local residents also have the opportunity to provide input through the DCO process. ES Chapter 5 - Alternatives Considered [APP-042] explains the size, location and extent of allotments considered, and why the land identified was considered most appropriate for the Project. While larger sites of contiguous ownership were preferred, these were not available in all cases and taking into account other site constraints.
509	n/a	Comments on PVDP Environmental Statement Non-Technical Summary. I consider this Application to be seriously lacking in hard facts. The subjective word "significant" is used one hundred and ten times in its various forms "insignificant", "not significant", "not significantly" etc. Its use is solely defined by the writer of the document but not shared with anyone else. We have no means of knowing what they are really saying.	The Project is an NSIP that is an EIA development as defined under regulation 3 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Under regulation 14, a DCO application for an EIA development must be accompanied by an environment statement. The environmental statement is required to include, under regulation 14(2)(b), "a description of the likely significant effects of the proposed development on the environment". This is where the term "likely significant effects" comes from and why you will see it referenced throughout the ES. Throughout the ES, the term 'effect' expresses the consequence of an impact. The significance of an effect is determined by correlating the magnitude of an impact with the sensitivity of a receptor, in accordance with defined criteria. Impacts can be direct, indirect, secondary, cumulative, inter-related or transboundary. The impacts may be adverse, beneficial or result in no change at all. Impacts are described in relation to the receiving environment, which is described as the receptor (or series of receptor groups). The result of an impact on a receptor is termed the 'effect'. Each technical chapter that assesses effects on the environment from the Project identifies in its methodology section how likely significant effects for that type of environmental effect have been determined. As environmental effects and how they are assessed can vary depending on the type of effect, the methodology section for each chapter also explains where other material, guidance or professional judgement has been relied on in determining significance of effects. The Non-Technical Summary [APP-037] provides a summary of the likely significant effects for each type of effect considered, but more detail can be found on how those assessments have been made in each relevant chapter.
898	n/a	In addition, the second document I looked at "EN010147-000630-EN010147_APP_2.3 - Works Plans - Rev 1" contains no indication of what the different "Work No"s 1 to 9 describe. The	The Explanatory Memorandum [AS-011] at section 1.4 provides an overview of the different works numbers proposed that together form the authorised development of the DCO, with each of these set out at Article 2 within the Draft Development Consent Order [AS-009] .

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		documentation should be provided in a way that it can be understood by the general public.	
11. Decommissioning			
24; 92; 161; 280; 290; 329; 343; 458; 481; 566; 611; 616; 766; 928; 945; 998; 1007; 1036; 1086 [VOWH]; 1102 [WODC]	Length of permission	42 years is not 'temporary' – it is a long time, and should be considered permanent – including in the assessment of impacts.	Solar farms are generally consented on the basis that they will be time-limited in their operation and pursuant to NPS EN-3 paragraph 2.10.65 are therefore "described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed." NPS EN-3 also recognises that an upper limit of 40 years is typical, but that applicants may seek consent without a time-period or for differing time-periods of operation (paragraph 2.10.66). The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any Project. Consent for the Project is sought for 42 years from commencement to de-commissioning and removal. The development is not proposed to be permanent, and the lifetime of the Botley West Project aligns with other similar solar farm projects of this scale and type, and which have been consented under the NSIP regime. The Project, as assessed in the EIA process and described in the Environmental Statement, takes this duration into account.
1086 Vale of White Horse District Council	Case Law	A recent solar development in Green Belt appeal decision covers this issue, concluding that 40 years was judged to not be "temporary".	An appeal decision, for a Section 78 Town & Country Planning Application, for a 25MW solar farm located in Green Belt in Dacorum Borough, dismissed in November 2023, is cited in the Relevant Representation from Vale of White Horse Council. The Council's comments highlight that the Inspector commented that '40 years is not temporary' – PINS appeal reference no. APP/A1910/W/23/3317818. However, the Applicant is able to direct the ExA to other Section 78 appeals, including a number allowed during 2024, where Inspectors have commented that whilst 40 years is a significant period of time, it is not permanent, and they have given limited weight to the point in terms of the permanence and openness of Green Belt. The following PINS appeal references are relevant in this context; APP/L3245/W/23/3329815; APP/T3725/V/23/3332671; APP/P3040/W/23/3329235; APP/J1535/W/23/3334690; APP/P0119/W/22/3294810; APP/N1920/W/22/3295268; APP/M1595/W/23/3328712; APP/B1550/W/23/3329891
205; 482; 611; 1010; 1033	Risk of Permanence	It's hard to see that the land will be reclaimed in the area where the grid connection will occur. The claim that the site will be restored is untrue – as the substation and cables will remain permanently.	The Project Description, set out in Volume 1, Chapter 6 of the Environmental Statement [APP-043], makes clear that, at the end of the Project's lifetime, all above ground infrastructure and equipment will be removed, with the exception of the National Grid substation to be located on or adjoining the Southern Site. The Project Description also confirms that cables beneath the main solar arrays will be removed, and cables will only remain in place where they have been laid beneath the public highway, or where they have been laid using horizontal directional drilling (HDD).
205; 500		Removal is only likely if other new sources of zero carbon electricity replace it, such as hydrogen or small nuclear reactors.	The Applicant agrees that a mix of alternative sources of clean renewable energy are likely to be the key driver behind the energy transition. This position is supported in government policy.

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		National policy favouring solar farms may change at some time in the future. The site should be decommissioned and cleared after a fixed lifespan.	The Project is seeking a time limited consent of up to 42 years, including an operational period of approximately 37.5 years. The outline Decommissioning Plan [APP-236] sets out the principles of the decommissioning activities for the Project, environmental mitigation and management measures, and implementation and monitoring controls on this process. The land within the Project Site Boundary will be returned to the respective landowners and to its original use after decommissioning. All above ground infrastructure will be carefully removed in accordance with the procedures and controls to be set out in the Decommissioning Plan and the Decommissioning Traffic Management Plan.
92		De-commissioning would mean that 330,000 homes would have to be supplied with electricity generated from some other source, which would cause impacts elsewhere.	As above, the Applicant would expect that alternative sources of clean energy are likely to be developed to supply both existing and future needs, in line with climate change targets and relevant growth plans. Whilst these alternatives will have their own impacts, it does not remove the intention to decommission the Botley West solar farm after the 42-year period of consent being sought.
24; 100; 205; 558; 711; 729; 822	Future Status of the Site	The land will have turned from agricultural to 'developed' or 'brown field' (not 'grey belt').	A number of the Relevant Representations question the effect of the development, and its longevity, on the planning status of the land in the future, and whether it would be deemed to be previously developed land, or 'brownfield'. Annex 1 of the National Planning Policy Framework (NPPF) provides the definition for previously developed land as land <i>'which is, or was, occupied by a permanent structure and any fixed surface infrastructure associated with it'</i>. The Botley West Solar Farm is not proposed to be permanent. The DCO application seeks a time-limited permission and EN-3 (paragraph 2.10.149), together with recent Solar DCO decisions from the Secretary of State recognise that solar farms can have a typical upper limit of 40 years. Many more recent Solar DCOs seek durations even longer than this. Also, the proposed development is specifically that of a renewable energy solar farm – and is not within a 'Use Class' that would convey a material change of use of the land to housing / commercial use and is not brownfield land as contemplated by the NPPF. On cessation of the solar farm development the land will revert to its original land use.
24; 92; 100; 289; 292; 329; 335; 443; 478; 479; 485; 496; 526; 558; 566; 596; 604; 611; 616; 626; 672; 729; 791; 852; 928; 969; 998; 1036		There is no guarantee that the land will be returned to its 'natural state' – and what will prevent other built development from occurring later?	As described above, the Applicant is not seeking a permanent permission, and the development will not convey a status upon the land as 'previously developed' that would allow it to default to other forms of built development. The outline Decommissioning Plan (oDP) [APP-236], submitted with the application, paves the way for more detailed commitments to be made and requirements to be set with any approval of the DCO that will ensure that the development is decommissioned appropriately after the project lifetime, and that suitable restoration occurs. In accordance with Requirement 14 of the draft Development Consent Order, the Applicant will prepare a final, detailed Decommissioning Plan no later than eight weeks prior to the intended date of decommissioning and submit it to the relevant planning authority for that part. The detailed Decommissioning Plan must be submitted substantially in accordance with

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			the outline Decommissioning Plan and must include a timetable for its implementation. The DP will set out all roles, responsibilities and actions required in respect of implementation of site management, monitoring and reporting procedures, including environmental protection measures.
726		Stringent planning conditions and land covenants should be enshrined against any permission of PV development to ensure that use is limited to temporary PV only and if this use was ever to cease, the land must be restored to its current condition as green field countryside, with no ability to be considered as brownfield, greyfield or any other land class which may allow for new development use to circumnavigate restrictions that would be applied to the site as if it were the current landscape and enjoy similar protections.	This is the Applicant's intention. As above, the outline Decommissioning Plan [APP-236], submitted with the application, paves the way for more detailed Requirements to be set with any approval of the DCO that will ensure that the development is removed after the project lifetime, and that suitable restoration occurs.
888		There is a serious risk of significant soil structure damage in the removal of all of the installation, repeating the damage caused in the build phase.	The outline Soil Management Plan, submitted as part of the outline Code of Construction Practice [APP-233] contains measures to limit impacts to soil resources, wherever practicable, through the application of recognised best practice measures in soil management. This includes the conservation of soil resources, the avoidance of damage to soil structures, aftercare measures for areas used for conservation grazing, and reinstatement on decommissioning.
100		I am concerned about the compulsory purchase of parts of the site.	While the Applicant seeks to secure land necessary for the Project by agreement with landowners, it is typical for such powers to be secured within the DCO to provide certainty that the land required for the construction, operation and decommissioning of the Project will be available. Part 5 of the Draft DCO [AS-009] sets out the powers of acquisition or temporary possession. These include powers to compulsorily acquire land or rights in land, to extinguish rights in land, or to take temporary possession of land. These articles relate only to the Order land, as shown on the Land Plans [AS-006].
34; 79; 198; 224; 248; 254; 272; 289; 310; 329; 346; 383; 417; 443; 446; 464; 475; 496; 521; 522; 525; 558; 589; 596; 672; 747; 766; 803; 822; 845; 852; 855; 873; 908; 950; 996; 998; 1003; 1077; 1083	Decommissioning Plan	There seems to be no adequate plan for how the scheme will be decommissioned. The project should have a much better defined 'end of life plan' – and which takes account of potential changes in ownership, waste, contamination and responsible recycling, including interim replacement of panels – and the restoration to open fields / arable land. It is not believable if there is insufficient detail on how the land will be restored.	Chapter 6 of the ES [APP-043] provides the Project Description and the parameters used for assessment purposes, including the decommissioning process and removal of equipment. The length of time associated with construction, commissioning, operation and de-commissioning, including recycling, have informed the basis of the environmental assessment. The application is supported by an outline Operational Management Plan [APP-234] and an outline Decommissioning Plan [APP-236]. A final, detailed Decommissioning Plan will be prepared and approved by the relevant planning authorities closer to the time of decommissioning and no later than eight weeks prior to the intended date of decommissioning (unless otherwise agreed with the relevant planning authority). Decommissioning of the Project is expected to last 24 months (approximately the same length of time it will take to construct). The Project is assessed in the Environmental Statement as being decommissioned after 37.5 years operation, with decommissioning assumed to not commence any earlier than 2066.

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			At the end of this period, all above ground infrastructure (excluding the NGET substation) and equipment will be removed, along with the cables beneath the main solar arrays, with the land continuing in agricultural use. Other than 33kV and 275 kV cables that have been laid in the public highway, and where cables have been laid using horizontal directional drilling (HDD), under rivers, roads, or railway, or under existing landscape features such as woodland and hedges, all other solar PV array infrastructure, including solar PV modules, mounting structures, cabling, inverters and transformers will be removed from the Site. The recycling and disposal of materials will be managed in accordance with the waste hierarchy and waste management plan associated with the decommissioning process. The Landscape, Ecology and Amenities Plan [APP-228] illustrates what the Site might look like after the solar arrays and other infrastructure are removed. On completion of decommissioning, the land then returns to the original landowner, who would be open to use the land for its original land use or continuing community food production if preferred in some areas. Changes in ownership, legacy management and maintenance, and costs and funding associated with these, are considered further below.
198; 823; 852		Failure to decommission the facilities in accordance with industry and environmental standards (as the result, for example, of lack of funding) would risk the permanent loss of some of the best and most versatile agricultural land in Oxfordshire, and a degradation in soil quality. Broken and toxic panels will leave the land useless for farming.	The solar panels, cables and associated infrastructure will be installed and removed in line with Management Plans that will be further detailed as Requirements associated with the grant of any permission, and tied to the DCO. The application is supported by an outline Soil Management Plan [APP-233] outline Operational Management Plan [APP-234], and an outline Decommissioning Plan [APP-236]. The outline Soil Management Plan includes the proposed approach to aftercare of soils, and the approach to identifying future soil management. The oOPM section 2 Operational Environmental Management, section 2.2.1 states that maintenance and servicing would include inspection, removal, reconstruction, refurbishment, or replacement of faulty or broken equipment, to ensure the continued effective operation of the Project. The elements of the installed solar farm represent a valuable asset for the Applicant, so it would be in its interests financially, to decommission the site to recycle or sell those components. Further, if the undertaker of the Order went into liquidation, its assets would be sold off to fund the decommissioning under the legal requirement. More information on the decommissioning phasing will be provided within the detailed Decommissioning Plan, to be developed in consultation with the host authorities, prior to decommissioning commencing pursuant to Requirement 14 of the draft DCO [AS-009]. The detailed Decommissioning Plan will secure the process and programme for decommissioning, including: • timescales; • transportation methods; • processing materials; • ecological and landscape enhancements; • risk management;

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			- stewardship and monitoring during decommissioning; and - other environmental improvements. The decommissioning document submitted with the application [APP-236] is currently outline in its nature, but will be developed in consultation the host authorities, local community and key stakeholders. The solar panels proposed for Botley West are durable, solid-state units with no liquids or hazardous substances that could leak during normal use or extreme weather. The materials used (silicon, EVA film, glass, backing film, aluminium frame) are stable and sealed. The cells are embedded in polymer films (e.g. EVA) and protected by front glass and back glass - this prevents material leakage. Paragraph 1.2.1 pf the outline Decommissioning Plan [APP-236] explains that the detailed Decommissioning Plan (DP) and Decommissioning Traffic Management Plan (DTMP) will be produced and approved for the Project following the appointment of a contractor. Approval and implementation of the DP and the DTMP will be secured through a Requirement of the DCO, and given the life of the consent they will necessarily be finalised closer to the time of decommissioning.
79; 92; 292		There is no estimate of cost of decommissioning within the application, and there is no plan to demonstrate how the 24-month decommissioning period has been arrived at, including the logistics of this task.	The Applicant has the financial means to acquire the required rights and build the Project as set out in the Funding Statement [APP-022]. With respect to financing of the decommissioning, if made, the draft Order [AS-009] would require the decommissioning of the Project to be carried out in accordance with a Decommissioning Plan (requirement 14, Schedule 2). An outline DP [APP-236] has been prepared as part of the DCO application. This provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement to prepare and approve the DP and for it to be substantially in accordance with the oDP, and for the approved DP to be implemented.
79; 92; 184; 185; 198; 286; 289; 428; 464; 468; 496; 521; 551; 589; 786; 794; 822; 852; 853; 860; 928; 1003; 1026; 1102 [WODC]		There needs to be more clarity and certainty on the length of the permission – regardless of interim re-powering / replacement panels – and more certainty on the costs and funding sources, binding agreements, on-going management and a bond for decommissioning, especially as the developer is based overseas and it seems unlikely any public agency would be prepared to underwrite the decommissioning costs.	The Applicant has the financial means to acquire the required rights and build the Project as set out in the Funding Statement [APP-022]. With respect to financing of the decommissioning, if made, the draft Order [AS-009] would require the decommissioning of the Project to be carried out in accordance with a Decommissioning Plan (requirement 14, Schedule 2). An outline DP [APP-236] has been prepared as part of the DCO application. This provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement to prepare and approve the DP and for it to be substantially in accordance with the oDP, and for the approved DP to be implemented. The Applicant is aware of its obligations in the draft DCO with respect to decommissioning and will need to plan for decommissioning of the Project if the Order is made – and any undertaker would similarly plan for the need for it to comply with the obligations on it under the DCO (for example, and the operator will set aside funds during the operation of the proposed development to meet the cost of decommissioning). Further, the requirement will be enforceable against anyone who holds the benefit of the Order at the time that the Project is decommissioned and failure to comply with the requirement would be a criminal offence pursuant

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			to section 161 of the Planning Act 2008. The Proceeds of Crime Act 2002 also acts as a further deterrent to such a breach. The elements of the installed solar farm represent a valuable asset for the Applicant, so it would be in its interests financially, to decommission the site in order to recycle or sell those components. Further, if the undertaker of the Order went into liquidation, its assets would be sold off to fund the decommissioning under the legal requirement. The Applicant therefore does not consider a bond to be necessary and we note that similar solar NSIP projects have not always required financial securities, a d PINs and the SoS have accepted that a decommissioning Requirement is sufficient. For example, similar arguments were made in the Cleve Hill examination, and were accepted by the ExA in its report, with which the SoS agreed. In particular, see para 12.3.50 which states that “Without clear precedent or Government guidance, we see no basis to justify a financial bond secured by requirement in the DCO. Moreover, we do not believe that such a requirement would meet the relevant law and policy on the drafting of requirements”. On Sunnica, the SoS’s decision recorded that several interested parties also raised issue with the applicant’s ability to fund the full delivery cost of the Proposed Development, including decommissioning [ER 7.5.124 et seq.]. However, consistent with all made solar DCOs to date, the SoS did not consider any bond or other form of security necessary to include in the Order. On Mallard Pass, the Examining Authority said [ExAR 7.4.73] “We do not consider it necessary for any further controls to be imposed on the timeframe for the decommissioning programme...” and “Whilst there were suggestions by Interested Parties for provision to be made for a financial bond, consistent with the other made DCO’s for solar projects we do not consider this to be necessary given the controls that would already be in place via Requirement 18 of the DCO”.
161		The applicant’s, self-admitted, adverse effects will not be reversible.	Paragraph 3.1.1 of NPS EN-1 explains that the UK Government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the UK Government considers the need for such infrastructure urgent. NPS EN-1 establishes a Critical National Priority (CNP) for nationally significant low-carbon infrastructure, and the definition of CNP infrastructure includes solar PV developments of greater than 50MW capacity. Paragraph 3.3.63 of NPS EN-1 explains that the government considers that the urgent need for CNP infrastructure to delivering national security, economic, commercial and net zero benefits, “will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP infrastructure, and it should be progressed as quickly as possible.”

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			Given the Project benefits from the CNP presumptions as CNP infrastructure, as set out in the planning balance in the Planning Statement any residual impacts are outweighed by the benefits of the Project. The Environmental Statement reports the overall level and nature of adverse effects, resulting from the construction, operation and decommissioning. Their degree of harm, including in terms of residual effects, is considered within the Environmental Statement, and a Summary of Significant Effects is provided withing Chapter 21 [APP-058]. A number of measures have been embedded within the design of the Project to mitigate potential adverse environmental effects. Where required, further mitigation measures are identified within topic chapters. These are measures that could further prevent, reduce and, where possible, offset adverse effects on the environment. Residual effects are defined as those effects that remain following the implementation of mitigation measures (embedded mitigation and where applicable additional mitigation). Table 21.1 of Chapter 21 [APP-058] sets out the significant residual and cumulative effects during the construction, operation and maintenance, and decommissioning of the Project.
532		It would be a waste of infrastructure to remove it in 40 years and leave unusable land.	The intention is that the development is for a time-limited period, to assist in meeting the UK's current clean renewable energy targets. In due course it is expected that alternative sources of clean energy will be developed that will allow the infrastructure to be superseded, and therefore removed. The land will not be unusable upon decommissioning. The land located beneath panels will be continuing in low density (conservation) grazing during operation, and will have been rested from more intensive agricultural use in the meantime. It is expected that this will provide positive benefits for the condition of soils, and water quality, as well as generating biodiversity net gain.
667		Will the panels be removed immediately at the end of the use?	The outline Decommissioning Plan [APP-236] indicates a 24-month programme for removal, once the energy generation operation ceases. The details of the decommissioning programme will be set out in the detailed Decommissioning Plan as approved by the host authorities, in due course.
79		There is no business case to change the land back to less profitable farming from more profitable energy development.	The business case will be dictated by the planning obligations within the Order. The order will require cessation of the solar farm and the Applicant and decision maker are entitled to assume at this point that resumption of farming is possible.
383; 558; 1102 [WODC]		The promised hedgerows meant to screen the development will require ongoing maintenance. Without strict oversight, they could be left to wither and die, failing to serve their intended purpose. There will be additional substantial ongoing management costs that need to be addressed.	The Outline Landscape and Ecology Management Plan [APP-235] presents the outline planting proposals for the land within the DCO, including the planting schedules and overall maintenance regime. This will be further developed into a detailed Landscape and Ecology Management Plan for the operational phase of the project, including legacy landscape that will remain in situ upon removal of the solar farm. It is expected that the management costs, funding streams and required commitments to these maintenance regimes will be managed as part of the Engineering, Procurement and Construction (EPC) process.

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			It is intended that green infrastructure, such as hedgerows that are planted, will remain in perpetuity after decommissioning and the land is handed back to the owners, and subsequent maintenance. This is, however, not in the Applicant's control.
104		Blenheim Estate has commented that – <i>'we will thoughtfully care for this land while it is used for clean energy generation and, when the land returns, it will have been rejuvenated as fertile fields for future generations'</i>	The Applicant welcomes this comment, and confirms that the operational land management role will be undertaken in close liaison with landowners.
34; 521		There is no carbon accounting for the decommissioning part of the project.	An assessment of carbon emissions associated with the construction, operation and maintenance, and decommissioning of the project has been set out within Volume 1, Chapter 14: Climate change, of the Environmental Statement [APP-051] , including an assessment of whole life effects (net effects).
219; 272; 383; 522; 558; 719		Whilst the project is for 40 years the panels won't enjoy a 40-year lifespan, they will degrade over time and lose efficiency.	The maintenance of the solar arrays, including the necessity for replacement panels, is described in the outline Operational Management Plan [APP-234] at Section 2.2.
185;286		Whilst the solar array may be easy to remove, it will be difficult to remove the larger plant and any contaminants, and the time taken to return the land to agricultural use is unknown.	Other than 33kV and 275 kV cables that have been laid in the public highway, and where cables have been laid using horizontal directional drilling (HDD), under rivers, roads, or railway, or under existing landscape features such as woodland and hedges, all other solar PV array infrastructure, including solar PV modules, mounting structures, cabling, inverters and transformers will be removed from the Site within a proposed 24 month period. The recycling and disposal of materials will be managed in accordance with the waste hierarchy and waste management plan associated with the decommissioning process. It is not expected that there will be any significant risk of contamination resulting from the operational or decommissioning phases.
185		Why demolish it? – presumably because by then it will have been superseded by more efficient methods of electricity production?	Yes. This is the expectation, i.e. that there will be alternative sources of clean energy available, that will supersede the need for large scale ground mounted solar farms.
248; 290		Will the many miles of underground cables used to connect to the sub-station also be removed?	Other than the 33kV and 275 kV cables that have been laid in the public highway, and where cables have been laid using horizontal directional drilling (HDD), under rivers, roads, or railway, or under existing landscape features such as woodland and hedges, all other solar PV array infrastructure, including solar PV modules, mounting structures, cabling, inverters and transformers will be removed from the Site. Chapter 6 of the ES [APP-043] provides the Project Description, and the parameters used for assessment purposes, including the decommissioning process and removal of equipment.
347		If the economics of solar power change it would be relatively easy to reinstate agricultural land, compared to nuclear or offshore wind projects.	The Applicant agrees. The decommissioning and restoration of solar farms is relatively straightforward in comparison to those other forms of energy generating infrastructure, and the land will continue to be available for agricultural use.
311		Solar farms are environmentally destructive in their production, existence and eventual dismantling.	The impacts of the proposed solar farm development, both negative and positive, as associated with the construction, operation and

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			decommissioning, have been assessed through the EIA process, and are reported in the Environmental Statement.
219; 468; 853		If the developer goes bust before the end of the project lifespan, who will be responsible for dismantling them?	The Applicant is aware of its obligations in the draft DCO with respect to decommissioning and will need to plan for decommissioning of the Project if the Order is made – and any undertaker would similarly plan for the need for it to comply with the obligations on it under the DCO (for example, and the operator will set aside funds during the operation of the proposed development to meet the cost of decommissioning). Further, the requirement will be enforceable against anyone who holds the benefit of the Order at the time that the Project is decommissioned and failure to comply with the requirement would be a criminal offence pursuant to section 161 of the Planning Act 2008. The Proceeds of Crime Act 2002 also acts as a further deterrent to such a breach. The elements of the installed solar farm represent a valuable asset for the Applicant, so it would be in its interests financially, to decommission the site in order to recycle or sell those components. Further, if the undertaker of the Order went into liquidation, its assets would be sold off to fund the decommissioning under the legal requirement. The Applicant therefore does not consider a bond to be necessary and we note that similar solar NSIP projects have not always required financial securities, and PINs and the SoS have accepted that a decommissioning Requirement is sufficient.
255; 558		If ownership changes, potentially involving foreign investors, it could potentially complicate decommissioning further.	The requirement will be enforceable against anyone who holds the benefit of the Order at the time that the Project is decommissioned and failure to comply with the requirement would be a criminal offence pursuant to section 161 of the Planning Act 2008. The Proceeds of Crime Act 2002 also acts as a further deterrent to such a breach.
44; 292; 309; 858		Decommissioning will be a problem for future generations – difficult and very expensive.	The Applicant, in providing responses to the points raised above, hopes to provide reassurance that the correct and appropriate mechanisms will be in place for the decommissioning process, without proving a burden to future generations.
12. Fire Safety			
117, 442, 913, 1060	Thermal Effects and Overheating	Thermal effects associated with solar panels have, in some cases, been linked to fire risks, which may warrant consideration when installing them near residential areas.	The risk of fire from thermal effects is very low, as the PV modules are certified to international safety standards and designed for safe operation across varying conditions (ES Chapter 6, Section 6.4.8). Operational monitoring and maintenance (Section 6.4.9) will ensure continued safety, and the ES concludes that overheating risks are negligible and not significant. Additionally, the layout ensures a minimum buffer of 25 metres between solar arrays and residential property boundaries, further reducing any potential impact.
904, 912	General Fire Safety Oversight	The Botley West project may pose increased fire and security considerations during dry periods due to nearby vegetation and its proximity to homes and schools.	Fire safety risks, including those from dry vegetation, are mitigated through setbacks from homes, clearance buffers from vegetation, and use of industry-standard infrastructure meeting all safety regulations. During operation, regular maintenance will control vegetation and ensure safe site conditions. Vegetation control is integral to fire prevention and will be addressed through regular maintenance practices, including mechanical cutting and conservation grazing, to reduce the potential for ignition beneath the panels

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217, 254, 567, 798, 938, 1026, 1092, 1104	Battery Fire Hazards	The planned inclusion of lithium-ion battery storage at the Botley West solar power station raises public health concerns related to fire risk, potential gas emissions, and proximity to residential areas, including a nearby nursery.	Section 6.4.3 of Chapter 6: Project Description [APP 043] confirms that Battery Energy Storage Systems (BESS) are not included as part of the Botley West Solar Farm development. As a result, the project does not present the battery-related fire risks typically associated with high-voltage energy storage infrastructure. Where energy storage is required, it will be managed off-site at existing grid facilities, such as the EDF 50MW BESS at Cowley substation, beyond the project boundary. This design approach materially reduces the overall fire risk profile of the development.
786	Emergency Response Limitations	The 1,300-hectare Botley West solar project introduces long-term considerations around maintenance access and emergency response, which may place additional demands on rural infrastructure and pose challenges for ensuring safety.	Safe and reliable access for emergency services during the operational life of the Botley West Solar Farm is addressed in the Outline Code of Construction Practice [APP 232] Section (1.8.21-1.8.22) . The internal access network has been designed to accommodate emergency vehicles, including fire engines and ambulances, with durable, all-weather tracks maintained across the site. Strategic emergency access points will remain unobstructed throughout the operational phase.
784	Toxic Fumes	Fires can release pollutants that may affect air quality in the immediate area and potentially contaminate soil and groundwater through leaching.	The potential for pollutant release from fires is acknowledged as a consideration in the assessment of health and environmental impacts. While such events are considered unlikely, measures are expected to be in place to manage associated risks and avoid or minimise potential effects on air quality, soil, and groundwater.
386, 935	Buffer Zone Concerns	The 25-meter buffer zone around solar battery storage areas may be insufficient given their fire risk, particularly with approximately 11,000 homes located within 1.5 km, prompting public safety considerations.	The buffer zones have been developed in line with established industry practice for solar photovoltaic (PV) developments and serve to provide precautionary separation between operational infrastructure and adjacent land uses. These setbacks contribute to managing safety risks, facilitating emergency access, and mitigating landscape and visual effects, as outlined in the Outline Layout and Design Principles [APP 238] . The application does not include a Battery Energy Storage System (BESS), as confirmed in Section 6.4.3 of Chapter 6: Project Description [APP 043] , and the buffer distances have therefore been assessed solely against the fire and safety profile of solar PV infrastructure, which is considered to present a low risk.
13. Green Belt			
13, 24, 30, 45, 63, 75, 76, 80, 100, 105, 143, 153, 190, 194, 198, 208, 224, 232, 242, 245, 253, 279, 285, 288, 295, 297, 298, 303, 310, 336, 342, 344, 345, 378, 419, 426, 431, 434, 452, 454, 456, 465, 469, 473, 477, 480, 485, 489, 492, 494, 500, 502, 508, 522, 536, 538, 546, 553, 558, 566, 574, 577, 599, 610, 619, 627, 632, 639, 641, 644, 665, 671, 690, 691, 707, 711, 719, 732, 742, 749, 758, 780, 786, 798, 812, 813, 822, 825, 841, 847, 878, 882, 887, 888, 889, 893, 894, 916, 917, 919, 919, 934, 936, 937, 969, 975, 976, 980, 996, 996, 998, 1001, 1003, 1004, 1010, 1019, 1020, 1021, 1023, 1044, 1104, 1007	Lack of justification	Insufficient planning justification for locating development in the Green Belt and conflict with Green Belt policy	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [APP-225] . At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. That VSC approach and weight to be attached to relevant factors accords with the requirements of NPS EN-1 section 5.11 and, in particular, para 5.11.37. The overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test. Arguably, because of this policy, the Applicant need not have made a VSC case. However, the Applicant has submitted a VSC case in the hope and expectation that the ExA and SofS will confirm that the test has been met in line with policy. The VSC case is also made to address concerns by Interested Parties (IP).

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			Sequential or Consecutive Approach to site selection In respect of whether there is a sequential test or consecutive approach when it comes to finding development sites in Green Belts, as some IP’s claim i.e. that one has to consider brownfield sites first before selecting Green Belt land, the Applicants position is that policy in this respect is a ‘<i>preference</i>’ not an absolute ‘<i>requirement</i>’. This position is explained below. Only in NPS EN-3 para. 2.10.29 and 2.10.31 does it make a reference to this matter. Para.2.10.29 states: “<i>While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land...</i>”. At para 2.10.31 of NPS EN-3, it notes the ‘<i>preference</i>’ for development to be on suitable brownfield...land”. In NPS policy terms therefore, the Applicant characterises policy as a <i>preference</i> in policy terms not a <i>requirement</i>; and even then only <i>where possible</i> and <i>where suitable</i>. To reinforce the point, in NPS EN-3, para 2.3.9, it states that as most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1,the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land). Beyond the NPS policy above, the NPPF (para 148) talks about a sequential test but only when considering a change in Green Belt boundaries or the release of Green Belt. The applicant is not seeking a change to nor a release from the Green Belt, and in the Applicants view therefore, para 148 does not apply. Notwithstanding the policy position on this matter, the Applicant, in its search for suitable sites, looked at previously developed and brownfield land for the Project as potential suitable sites. For example, the Applicant looked at land near to, and grid connection at, the former Didcot A power station, but that was controlled by RWE and neither the connection nor the land was available to the Applicant. Shortly after the Applicant’s enquiry, both the land (part of) and connection was subsequently used by a recently consented, and now constructed, data centre.
18, 30, 89, 91, 99, 117, 120, 124, 138, 139, 141, 159, 161, 184, 187, 208, 217, 218, 229, 240, 262, 263, 265, 277, 286, 300, 327, 343, 350, 386, 394, 405, 417, 418, 446, 447, 481, 491, 495, 504, 506, 528, 534, 541, 542, 544, 564, 611, 651, 654, 718, 722, 728, 737, 745, 746, 775, 786, 801, 806, 807, 832, 834, 854, 861, 872, 876, 881, 900, 906, 920, 926, 938, 946, 949, 959, 962, 973, 990, 1009, 1018, 1022, 1025, 1030, 1048, 1053, 1078, 1082, 1092, 1094, 1096, 1098, 1100, 1100, 1105, 1105, 1106, 1106	Openness & visual intrusion	There is an unacceptable loss of openness and visual intrusion	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [APP-225]. At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. This section deals with openness, in particular the visual and spatial aspects of openness. In respect of the analysis of the function of the Green Belt, and its purposes, both the Applicant and IP’s, including the host authorities, may need to revisit this in light of the PPG on Green Belts published February 2025. Amongst other matters, this PPG has changed the way in which one should assess the contribution land makes to the relevant Green Belt purposes. Some IP’s (e.g. RR 1007) are relying upon existing Green Belt

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			Studies prepared by the authorities in asserting a conflict between the Applicants analysis and the importance attributed to certain gaps between settlements in these studies e.g. In particular, some refer to the Oxford Green Belt Study prepared by LUC dated October 2015 and the importance of various parts of the Green Belt e.g. the gaps between <i>Long Hanborough/Bladon and Bladon/Begbroke</i>. However, this study may now be redundant or at least largely undermined in light of the new guidance. The new PPG on Green Belts states at paragraph: 004 Reference ID: 64-004-20250225, that: <i>"...when making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d. Considerations for informing these judgements are set out below:</i> <i>Purpose A – to check the unrestricted sprawl of large built up areas</i> <i>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas...</i> <i>Purpose B – to prevent neighbouring towns merging into one another</i> <i>This purpose relates to the merging of towns, not villages.</i> <i>Purpose D – to preserve the setting and special character of historic towns</i> <i>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. "</i> Studies such as that undertaken by LUC now appear to be out of date as they have assessed the functions of gaps between <i>villages</i>, when it is <i>towns</i> that now should be considered in relation to Purpose A, B and D. Hanborough/Bladon and Bladon/Begbroke and indeed Kidlington are all villages close to the Order Limits of the Applicants Project. The nearest towns for these purposes are now Banbury and Woodstock to the North, Witney to the West, Oxford City to the East and Abingdon to the South. Visual impact is also dealt with the Landscape and Visual Impact chapter of the ES [APP-045].
138, 179, 182, 235, 237, 248, 252, 254, 255, 280, 290, 290, 292, 292, 301, 309, 310, 331, 334, 337, 338, 340, 356, 366, 368, 380, 384, 388, 391, 404, 431, 436, 458, 461, 466, 468, 482, 496, 497, 542, 547, 563, 569, 583, 584, 585, 589, 593, 631, 633, 672, 677, 685, 702, 720, 723, 727, 731, 733, 747, 748, 752, 753, 755, 756, 766, 797, 799, 810, 814, 829, 833, 837, 855, 863, 866, 868, 908, 908, 910, 911, 912, 914, 935, 940, 948, 950, 954, 995, 1015, 1074, 1088, 1090, 1098, 1105, 1105	Green Belt alongside other impacts	There is an impact upon Green Belt as well as other related impacts e.g. BMV, health and wellbeing, and ecological impacts. Also statements concerning the amount of Green Belt affected by the Project.	Many representations link/associate Green Belt alongside other issues. In this regard, Issues of relating to the historic environment, visual intrusion, health and amenity, use of agricultural land and rights of way, can be found in the ES at Chapters 7, 8, Chapter 16 and Chapter 17 respectively [APP-044, APP-045, APP-053 & APP-054]. Various percentages have been quoted about land take from the Green Belt, but the Applicants’ assessment is as follows. The Oxfordshire Green Belt in total occupies an area of approximately 34,464 ha. The above ground development of the Project occupies an area of approximately 497 ha. or 1.4% of the total Oxfordshire Green Belt. Approximately 31% of the total area of the Project site (the DCO Order Limits) lies beyond the Green Belt and 69% falls within it. All of the Northern Site lies beyond the Green Belt.

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			All except a limited margin at the western edge of the Central Area falls within the Green Belt. All of the Southern Site falls within the Green Belt.
14. Ground Conditions			
RR-0308 Environment Agency	Legislation	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: Some key guidance and policy documentation is missing or has been updated since issue of the ES: - The Water Supply (Water Quality) (Amendment) Regulations 2018 not cited. - Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019 not cited. National Planning Policy Framework (NPPF) was updated following issue of the Environmental Statement (ES), in December 2024. The Environment Agency's Approach to Groundwater Protection, February 2018. Impact: Aspects of the ES may not adequately address current guidance and policy requirements. Solution: Applicant to update references in the ES and ensure any relevant changes in policy or guidance are reflected appropriately.	References to Regulation Amendments were omitted from the Chapter however the amendments are considered as part of the assessment presented within the Chapter. The update of the NPPF post-dated preparation of the Chapter however this will not alter the assessment presented. Reference to the EA's Approach to Groundwater Protection will be included as part of the SoCG with the EA.
RR-0308 Environment Agency	Hydrogeology	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: The summary of the hydrogeological setting of the Proposed Development presented in the ES is very limited, presenting no discussion of groundwater depths (such as presented in Table 5.5 of Appendix 10.7), anticipated flows within the on-site superficial and bedrock aquifers and potential connectivity between groundwater and surface water bodies. Impact: Limited groundwater characterisation information is presented or discussed, such that we do not consider the applicant has demonstrated a sufficient understanding of the hydrogeological setting of the site and therefore may not adequately identify all potentially significant risks posed by the development.	The desk based assessment undertaken is considered sufficient to determine the relative risk to groundwater. The ground investigation to be undertaken under Commitment 11.2 of the Project Mitigation Measures and Commitments Schedule (Appendix 6.1 of the ES) [APP-129] will provide further site-specific data which will allow the risk levels determined within the Preliminary Risk Assessment to be refined through further development of the Conceptual Site Model and risk assessment.

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		Solution: Applicant to provide greater detail with respect to the anticipated groundwater regime present within the Study Area.	
RR-0308-011 Environment Agency	Sensitive Criteria	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: Listed receptors do not clearly differentiate between private or public groundwater abstractions or groundwater abstraction Source Protection Zones (SPZs). Impact: No clear metric by which to judge the risk posed to sensitive groundwater abstractions by the Scheme is presented in the report. Solution: Update Table 11.9 to include the relative sensitivity of Groundwater SPZs and public and private groundwater abstraction boreholes.	The sensitivity of groundwater abstractions (licensed or PWS) will be based on the source unit (aquifer classification) and importance of the resource as defined by DMRB criteria used in Table 11.9.
RR-0308-012 Environment Agency	Maximum Design Scenario	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: Maximum Design Scenario (MDS) does not include potential for mobilisation of leachate / leachable contaminants from identified sources except the potentially infilled sand pit in land parcel 9. No consideration of leachate / leachable contaminant impact on groundwater quality resulting from construction / decommissioning activities at potential contamination source Hensington Cutting Landfill Site, although potential hazardous gas migration from this feature is considered. Trenching through the landfill or HDD below the base of the landfill could result in the creation of a preferential migration pathway for mobile contamination. Impact: No consideration of leachate / leachable contaminant impact on groundwater quality resulting from construction / decommissioning activities at potential contamination source Hensington Cutting Landfill Site, although potential hazardous gas migration from this feature is considered. Trenching through the landfill or HDD below the base of the landfill could result in the	It is expected that the MDS for this scenario would be through trenching and this pathway may be added to the creation of new pathways line item for land parcel 15. Should the selection of HDD be progressed it is expected that this will be below the landfill mass and its construction will be supported by the findings of the ground investigation (and subsequent risk assessment) (Commitment 11.2 of the Commitments Schedule [APP-129]).

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		creation of a preferential migration pathway for mobile contamination. Solution: Include MDS for mobilisation of leachate/leachable contaminants from Hensington Cutting Landfill Site in Table.	
RR-0308-013 Environment Agency	Mitigation measures – contamination and remediation	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: Commitments 11.5, 11.6 and 11.8 of the table relate to the prevention of pollution during the Project. These do not include a commitment to remediate contamination should this occur. Impact: Potential for contamination to impact groundwater quality if suitable remediation is not carried out. Solution: Applicant should include a plan to carry out remediation activities should contamination impacts occur during construction or other activities during the lifetime of the Scheme. A requirement regarding this issue is necessary. Please see Issue ref. EAREQ-006 below	Commitment 11.3 of the Project Mitigations Measures and Commitments Schedule [APP-129] requires a Remediation Strategy be prepared should ground investigation or any discovered contamination (and subsequent risk assessment) determine that remediation is required.
RR-0308-013 Environment Agency	Sources of contamination	Volume 3 Appendix 11.1 to 11.13 [APP-175 to 194] Issue: The reports do not consider new sources of contamination relating to future land use, i.e. the construction, operation and decommissioning of the Proposed Development Impact: Potential impacts from new contamination sources relating to the proposed development may not be suitably assessed and mitigated. Solution: The applicant should consider possible sources of contamination associated with agricultural land use, and new sources of contamination associated with the construction, operation and decommissioning of the Proposed Development in the PRA. Additional Comments: The reports present potential pollutant sources identified for each respective Land Parcel. This incorporates current and historic sources of contamination but does not consider new sources relating to future land use and does not consider	The principal purpose of the DTS and PRA reports is to determine the geo-environmental risks in relation to the proposed development utilising existing baseline conditions with regard to the environmental setting and the potential for contamination to exist as a result of historical and current land use / activities. It follows the Source-Pathway-Receptor approach set out under Part 2A of the Environmental Protection Act 1990. The potential for new sources of contamination resulting from the development is not the remit of these studies. The potential for new contamination to arise as a result of construction/decommissioning of the project and its operation/maintenance is considered within Section 11.9, Volume 1 Chapter 11: Ground Conditions [APP-048]. The principal mitigation measures to be adopted are the implementation of the CoCP and standard Operational Procedures.

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		the potential for diffuse or localised sources of contamination associated with historic or current agricultural land use. The reports do however state that the presence of unknown soil contamination being discovered during construction works cannot be entirely discounted and recommend that works stop and specialist advice should be obtained about how to proceed in this instance.	
RR-0308-018 Environment Agency	Groundwater receptors	Volume 3 Appendix 11.1 [APP-175] Issue: Many of the PRAs appended to the ES conclude that while superficial deposits and shallow or outcropping bedrock for many of the Land Parcels include Primary and/or Secondary A aquifers, representing potentially significant receptors, due to the absence of identified abstractions and SPZs within the search buffer these have been assigned low sensitivity. The Principal and Secondary A aquifers are receptors in their own right, regardless of the presence or absence of abstractions and must be protected from contamination. Furthermore, it is likely that there is significant interaction between groundwater and surface water on many of the Land Parcels, evidenced by the presence of small bodies of standing water across the site 'rises' and 'springs' shown on OS maps at various locations. This indicates that surface water bodies could be impacted by groundwater contamination in the absence of abstraction. Impact: Potential for improper mitigation of impacts to groundwater receptors based on underestimation of risks posed by the Proposed Development Solution: We expect these groundwater receptors to be considered as moderately to highly sensitive going forward. The applicant should revisit the PRA, assigning appropriate sensitivity to aquifer groundwater receptors.	The risks applied within the PRA are determined using professional judgement and are based on the Source-Pathway-Receptor approach set out under Part 2A of the Environmental Protection Act 1990. The ground investigation to be undertaken under Commitment 11.2 of the Project Mitigation Measures and Commitments Schedule [APP-129] will provide site-specific data which will allow the risk levels determined within the Preliminary Risk Assessment to be refined through development of the Conceptual Site Model and further risk assessment. Groundwater receptors will be considered sensitive receptors within the preparation of the CoCP, including the PPP and construction drainage design, which will provide appropriate mitigation.
RR-0308-018 Environment Agency	Contamination from off-site sources	Volume 3 Appendix 11.4 [APP-179] Issue: Section 3.2.5 lists Oxford Airport (30m N/NE of Land Parcel 11) as a potential source of contamination particularly with regard to oils, fuels and spills/leaks associated with the runway. The report does not mention the potential for the	We note the potential for PFAS contamination to be present within groundwater as a result of any firefighting foams used at the airport. We note the likely groundwater flow direction from Oxford Airport to the south onto site.

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		presence of PFAS contamination associated with firefighting foams. The report asserts in Section 3.2.9 that shallow groundwater flow direction is likely to be toward the north, however a review of local topography indicates a gentle slope downward from the offsite Oxford Airport toward Parcels 5, 11 and 6. These are indicated on our records to be directly underlain by outcropping bedrock designated as Secondary A aquifer, with Oxford Airport underlain by either the same outcropping Secondary A aquifer or superficial Secondary A aquifers. The Preliminary Conceptual Site Model presented in Table 3.1 does not consider possible impacts to on-site groundwater quality from Oxford Airport / the historic WII airbase. We consider the potential for transmission of contaminants from the airport via shallow or deep groundwater cannot be discounted at this time. Note that a spring is evident on historic Ordnance Survey maps provided as an appendix to the PRA which shows the presence of a spring immediately adjacent to Land Parcel 11 at approximate NGR 446800, 214350 and apparently discharging into Rowel Brook. Impact: Potential for impacts from offsite contamination sources not to be identified, which may be exacerbated by the construction of the Proposed Development if unmitigated. Solution: Recommend that the applicant should reassess the likely groundwater regime within the site and the potential for contaminative impact from offsite sources; in particular, Oxford Airport.	The foundations anticipated for the solar arrays are likely to be shallow and the potential for vertical migration of contaminants within any shallow groundwater present to deeper units is limited. Notwithstanding this the ground investigation to be undertaken under Commitment 11.2 of the Project Mitigation Measures and Commitments Schedule [APP-129] will provide site-specific data which will allow the risk levels determined within the Preliminary Risk Assessment to be refined through development of the Conceptual Site Model and further detailed risk assessment. Additionally the Discovery Strategy to be implemented during construction (Commitment 11.1 of the Project Mitigation Measures and Commitments Schedule [APP-129]) will include details regarding the visual/olfactory indicators and strategy for dealing with the potential presence of PFAS contamination.
RR-0308-018 Environment Agency	Groundwater receptor sensitivity	Volume 3 Appendix 11.1 [APP-175] Issue: The PRA concludes in Section 3.2.9 that the Secondary A aquifers associated with bedrock are considered to be a sensitive receptor, but that as there are no groundwater abstractions within and SPZs within 500m these are considered to be low sensitivity. These receptors are considered within the outline Conceptual Site Model presented in Table 3.1 and assigned a qualitative risk rating of 'Low', based on risk from historic/current land use, however the basis for this determination is unclear. Impact:	The risk levels applied within the PRA are determined using professional judgement and are based on the Source-Pathway-Receptor approach. The ground investigation to be undertaken under Commitment 11.2 of the Project Mitigation Measures and Commitments Schedule [APP-129] will provide site-specific data which will allow the risk levels determined within the Preliminary Risk Assessment to be refined through development of the Conceptual Site Model and further risk assessment. Groundwater receptors will be considered sensitive receptors within the preparation of the CoCP, including the PPP and construction drainage design, which will provide appropriate mitigation.

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		Potential for inadequate mitigation of impacts to groundwater receptors based on underestimation of risks posed by Proposed Development. Solution: We expect these groundwater receptors to be considered as moderately sensitive going forward. The applicant should revisit the PRA including the CSM, assigning appropriate sensitivity to aquifer groundwater receptors. Additional Comments: We are pleased to see that the risk posed to Secondary A aquifers by contamination associated with the onsite historic Hensington Railway Cutting landfill site, has been assigned a 'Moderate' Qualitative Risk Rating, on the basis that there is a potential risk of the creation of a preferential contamination migration pathway for leachate mobilisation, indicating that further assessment is required. However, the derivation process for this rating is not clear in the report. The Secondary A aquifers are receptors in their own right, regardless of the presence or absence of abstractions and must be protected from contamination.	
RR-0164-020 Cherwell District Council	No further comments	CDC welcome the inclusion of mitigation in the form of further investigation/remediation and a watching brief and procedures to be followed in the event of unexpected contamination being encountered as per the suggested requirements in the Council's S42 response to the applicant on 08 February 2024. Similarly, the Council welcomes the inclusion of a Materials Management Plan and the export of incidentally extracted excess sand and gravel for reuse off site in the proposed mitigations as previously recommended. The Council's Environmental Protection team have no comments on this chapter of the ES.	It is acknowledged that the Cherwell District Council Environmental Protection team has no comments on the Ground Conditions chapter of the ES.
15. Historic Environment			
4, 63, 79, 89, 207, 229, 231, 250, 252, 290, 301, 317, 329, 330, 341, 343, 366, 386, 496, 532, 564, 592, 794, 616, 625, 712, 809, 840, 845, 854, 872, 887, 908, 912, 941, 950, 969, 1040, 1063, 1087, 1096	Impact on the historic environment	General concerns regarding the impact of the Project on the overall historic environment	The Applicant has undertaken a thorough assessment of the likely effects of the Project on all aspects of the historic environment. After accounting for embedded and additional mitigation, no significant adverse effects were identified. The Applicant's assessment of likely impacts and effects in respect of the Blenheim Palace World Heritage Site is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the

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			report was carried out within an iterative process in consultation with Historic England. The Heritage Impact Assessment identified a likely ‘minor negative’ impact on one attribute (Attribute 7) which contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. The overall assessment of likely impacts and effects of the Project on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as ‘negligible adverse’, based on the ‘minor negative’ impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4, [APP-141]). The impact would be time-limited and fully reversible. The sensitivity/value of the WHS is determined as ‘very high’, resulting in a likely effect of ‘minor adverse’ significance, which is not significant in EIA terms. The Applicant notes that in their Relevant Representation (RR-0398), Historic England does not disagree with the Applicant’s assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4, [APP-141]), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment [CR1-003]. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS. The Applicant also notes that ICOMOS-UK has made a Relevant Representation in respect of the scheme [RR-0413]. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the OUV of the UK World Heritage Sites and their settings is one of their key objectives. ICOMOS-UK state that <i>‘the proposed Botley West solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map ‘Character of Setting of WHS’ on page 50 of Appendix III of the Management Plan’</i> (emphasis added). The detailed assessment of likely impacts and effects of the Project on other designated heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment [APP-142]. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>. The assessment did not identify any significant effects in respect of impacts on designated heritage assets as a result of change within their setting. Long-term effects of minor adverse significance would occur in respect of three Scheduled Monuments, one Grade I Registered Park and Garden, two Grade I listed buildings, two Grade II* listed buildings, eleven Grade II listed buildings, four Conservation Areas and one non-designated historic building. Long-term effects of negligible adverse significance would occur in respect of one Grade II listed building and one Conservation Area. All effects would be time-limited and fully reversible.

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			The assessment of likely impacts and effects of the Project on the character of the historic landscape is presented in paragraphs 7.9.70 – 7.9.89 of ES Chapter 7: Historic environment [CR1-003]. The assessment found that the magnitude of the likely impact on the character of the historic landscape would be 'low adverse' during the construction phase, the operation and maintenance phase and the decommissioning phase. In each case this would result in an effect of 'minor adverse' significance, which is not significant in EIA terms. The location, nature and date of buried archaeological remains within the Order Limits for the Project have been established through a combination of desk-based research and a programme of fieldwork comprising geophysical survey and trial trenching. All of this has been agreed in advance with the Lead Archaeologist at Oxfordshire County Council. The mitigation strategy for buried archaeological remains has also been agreed with the Lead Archaeologist at Oxfordshire County Council. The mitigation strategy ensures that all areas containing significant archaeological remains are excluded from the development and retained as managed grassland. This approach is set out in Table 7.14 and paragraph 7.9.7 of ES Chapter 7: Historic environment [CR1-003]. A total of 44 such areas have been identified and excluded from the development. These are indicated on ES Figures 2.1a – 2.1c Illustrative Masterplan [AS-020]. As set out in paragraphs 7.9.13 – 7.9.20 of ES Chapter 7: Historic environment [CR1-003], the likely effect of the Project on archaeological remains of national and/or regional importance during the operation and maintenance phase of the Project will be beneficial rather than adverse. This is due to the removal of areas containing such archaeological remains from the current arable regime (which puts the archaeological remains at risk from regular damage through ploughing) and the placement of these areas within managed grassland.
18, 182, 199, 217, 243, 279, 286, 386, 505, 566, 569, 577, 589, 617, 785, 786, 810, 919, 928, 996, 998, 1004, 1007, 1036, 1051, 1090	Impacts on Conservation Areas and listed buildings	General concerns regarding the impact of the Project on Conservation Areas and listed buildings	The Applicant has undertaken a detailed assessment of the likely impacts and effects of the Project on designated heritage assets (including Conservation Areas and listed buildings) as a result of change to their setting. The results of this assessment are presented within ES Appendix 7.5: Settings Assessment [APP-142]. The assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>. The assessment did not identify any significant effects in respect of impacts on designated heritage assets as a result of change within their setting. Long-term effects of minor adverse significance would occur in respect of three Scheduled Monuments, one Grade I Registered Park and Garden, two Grade I listed buildings, two Grade II* listed buildings, eleven Grade II listed buildings, four Conservation Areas and one non-designated historic building. Long-term effects of negligible adverse significance would occur in respect of one Grade II listed building and one Conservation Area. All effects would be time-limited and fully reversible.
34, 276, 315, 336, 386, 912, 913, 915, 954, 983, 1007	Impacts on the historic landscape	General concerns regarding the impact of the Project on the character of the historic landscape	The character of the historic landscape within the Project site is described in paragraphs 1.5.244 – 1.5.259 of ES Appendix 7.1: Historic environment desk-based assessment [APP-131]. The assessment of likely impacts of the Project on the character of the historic landscape is presented in paragraphs 7.9.70 – 7.9.89 of ES Chapter 7: Historic environment [CR1-003]. The assessment found that the magnitude of the likely impact on the character of the historic landscape

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			would be 'low adverse' during the construction phase, the operation and maintenance phase and the decommissioning phase. In each case this would result in a long-term (time-limited) effect of 'minor adverse' significance, which is not significant in EIA terms.
16, 79, 198, 217, 231, 235, 271, 272, 286, 288, 290, 386, 429, 496, 505, 469, 579, 641, 723, 732, 810, 833, 910, 913, 928, 973, 983, 1001, 1004, 1050	Impacts on archaeological remains	General concern regarding the impact of the Project on buried archaeological remains	The location, nature and date of buried archaeological remains within the Order Limits of the Project have been established through a combination of desk-based research and a programme of fieldwork comprising geophysical survey and trial trenching. All of this has been agreed in advance with the Lead Archaeologist at Oxfordshire County Council. The results of the desk-based research are presented in ES Appendix 7.1: Historic environment desk-based assessment [APP-131] and ES Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology [APP-132]. The results of the programme of geophysical survey are presented in ES Appendix 7.3: Geophysical survey report Parts 1-8 [APP-133 – APP-140]. A programme of trial trenching has been undertaken within much of the Order Limits for the Project, with a total of 885 trenches being excavated and recorded. The locations of all trenches, and the methodologies deployed for the fieldwork and recording, were agreed in advance with the Lead Archaeologist at Oxfordshire County Council. The reports on the results of this programme of trial trenching are being prepared and will be submitted into the Examination as soon as possible. The mitigation strategy for buried archaeological remains has been agreed with the Lead Archaeologist at Oxfordshire County Council and ensures that all areas containing significant archaeological remains are excluded from the development and retained as managed grassland. This approach is set out in Table 7.14 and paragraph 7.9.7 of ES Chapter 7: Historic environment [CR1-003]. A total of 44 such areas have been identified and excluded from the development. These are indicated on ES Figures 2.1a – 2.1c Illustrative Masterplan [AS-020]. It is the Applicant's position, as set out in paragraphs 7.9.13 – 7.9.20 of ES Chapter 7: Historic environment [CR1-003], that the likely impact of the Project on archaeological remains of national and/or regional importance during the operation and maintenance phase of the proposed development would actually be beneficial rather than adverse. This is due to the removal of areas containing such archaeological remains from the current arable regime (which puts the archaeological remains at risk from regular damage through ploughing) and the placement of these areas within managed grassland.
1070	Legal Protection of Akeman Street	I have received notice of compulsory ownership /access to Akeman Street immediately alongside Sansom's Cottage and field 1.11 despite the street having legal protection. This route is also the Drovers Path – an ancient right of way joining farms with the Royal Hunting Lodge at Blenheim built in 1129 by Henry I. This route also has legal protection.	The Applicant is not aware of any legal protection afforded to the Roman road known as Akeman Street. The Roman road lies immediately adjacent to, but outside of, the Scheduled Monument at Sansom's Platt. No part of the proposed works would physically affect any part of Akeman Street and Historic England have not expressed any concerns regarding impacts to the Roman road at this location.
1070	Proximity of cable route to Scheduled Monument	The proposed cable route will also be directly alongside known heritage and archaeological sites and so highly likely to contain Roman buildings.	The Applicant has undertaken desk- and field-based archaeological evaluation work across all land within the Order Limits in the vicinity of the Scheduled Monument at Sansom's Platt.

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			The results of the desk-based work are presented in ES Appendix 7.1: Historic environment desk-based assessment [APP-131] and ES Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology [APP-132]. The results of the field-based work are presented in ES Appendix 7.3: Geophysical survey report [APP-133 – APP-140]. A programme of trial trenching has also been undertaken. The locations of all trenches, and the methodologies deployed for the fieldwork and recording, were agreed in advance with the Lead Archaeologist at Oxfordshire County Council. The reports on the results of this programme of trial trenching are being prepared and will be submitted into the Examination as soon as possible.
1070	Compliance with UNESCO Convention	The UK is a member state of UNESCO as detailed in the 1972 UNESCO World Heritage Convention. <i>"Each State, party to this Convention (referencing the UK and Northern Ireland) recognises the duty to ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage situated on its territory.... recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory, belongs primarily to that State."</i> In 1984 the UK ratified the 1972 Convention. (Ref: Articles 4 & 5) including The 1976 Safeguarding of Historic Areas meaning UNESCO doesn't just protect WHS's. UNESCO's programmes and values were emphasised when Dr Mechtild Rössler, the Director of UNESCO's World Heritage Centre, told UK ministers to <i>"do everything they could to conserve the UK's treasures."</i> (not just UNESCO sites). Rössler said <i>"developers should be made more aware of the international value of places before proposing potentially harmful projects"</i>.	National planning policy in England is set out in the National Planning Policy Framework (NPPF) and the suite of National Policy Statements. These were all published subsequent to the UK ratification of the Convention Concerning the Protection of the World Cultural and Natural Heritage (1972), more commonly known as the World Heritage Convention. EN-1 has been developed taking into account the UK's international obligations, including under the World Heritage Convention, and expressly recognises that management of impacts on World Heritage sites are an important matter for the Secretary of State to consider. Section 5.9 of EN-1 provides a framework through which impacts on World Heritage Sites are required to be assessed based on their significance, with any impacts to be balanced against the wider benefits of the Project. The obligations to protect cultural heritage have therefore been considered within the establishment of national planning policy, and the Applicant has prepared their DCO application in accordance with that policy framework.
1070	Impact on the World Heritage Site	In 2017 Blenheim WHS drew up <i>'The Blenheim Palace World Heritage Site Revised Management Plan'</i> referencing UNESCO's 2015 Operational Guidelines 2.04 Para 13. This plan was necessary to align the Blenheim WHS to UNESCO's rules and regulations for such sites which, as a member State, the UK is committed to. The plan specifically stressed the importance of <i>"protecting the high quality environment from such developments as solar farms"</i> referencing the unwanted damage and infringement of UNESCO rules a solar farm would do to the WHS / Blenheim Estate. Crucially, the Plan states that all land owned by Blenheim is part of the WHS (giving it its OUV). This subjects the whole area to UNESCO rules. There is precedent to UNESCO, through its member States, acting to protect the surrounds and approaches to Historic sites. I reference the proposed Stonehenge	The Applicant has prepared a Heritage Impact Assessment in respect of the Blenheim Palace World Heritage Site (ES Appendix 7.4, [APP-141]), which examines the likely impact of the Project on the OUV of the Blenheim Palace WHS. The Heritage Impact Assessment was produced in line with UNESCO guidance and through an iterative process that involved consultation with Historic England. No part of the Project is located within the World Heritage Site, but parts of the Northern and Central Site Areas are considered to be within the setting of the World Heritage Site. The Heritage Impact Assessment considers the 2017 Revised Management Plan for the World Heritage Site, including Appendix III of that Management Plan which addresses the setting of the World Heritage Site.

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		Tunnel, proposed development of the approaches to Liverpool docks, a dam proposal above the Victoria Falls and halting a highway near the Giza Pyramids.	The 2017 Revised World Heritage Site Management Plan does not state that <i>'all land owned by Blenheim is part of the WHS'</i> as asserted by the Relevant Representation. The boundary of the World Heritage Site is clearly identified on drawings that were prepared at the time that it was first inscribed on the World Heritage List (1987). The location of the Order Limits for the Project in relation to the boundary of the World Heritage Site is indicated on Figure 1.1 in ES Appendix 7.4, Blenheim Palace World Heritage Site - Heritage Impact Assessment [APP-141]. Land owned by Blenheim Estates outside the defined boundary of the World Heritage Site could be considered to be part of the setting of the World Heritage Site. However, the extent of the ownership has changed over the centuries since the establishment of Blenheim Palace, as land was purchased and sold (and on some occasions repurchased), so ownership should not be seen as the sole criterion for inclusion within the setting.
1070	Status of Sansom's Platt	The Developers submission: 1 Designated Heritage Assets 7.6.26 <i>"Key features for the Roman period include the important military road known as Akeman Street which crosses the Northern Site Area and adjacent to which is a villa or possible a small settlement containing several buildings including a potential temple."</i> It is important to correct the utterly erroneous reference to "a villa or possible a small settlement containing 'several' buildings" because it downplays the importance and proven size of the Roman Town at Sansom's Platt.	The Relevant Representation is quoting paragraph 7.6.26 of ES Chapter 7: Historic environment [CR1-003] which is part of a brief summary of the archaeological background of the area. This description is not <i>'utterly erroneous'</i> as claimed by the Relevant Representation; the Roman site at Sansom's Platt is currently identified on the National Heritage List for England as a Roman villa, although as set out in this text it is now considered to be a settlement of a type more widely known as a 'Roman small town'. A more detailed description is provided in paragraphs 1.5.127 – 1.5.129 of ES Appendix 7.1: Historic environment desk-based assessment [APP-131], which includes the statement that <i>'The scheduled Roman site to the south of the Roman road at Sansom's Platt is outside the Project Site, but activity associated with this settlement clearly extends beyond the scheduled area. The main focus of activity includes several structures either side of a street or track, also a possible circular temple within a walled enclosure'.</i> The review of aerial photographs presented in ES Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology [APP-132] demonstrates the extent of likely Roman activity outside the Scheduled Monument, whilst the geophysical survey report ES Appendix 7.3: Geophysical survey report [APP-133 – APP-140] provides yet further information regarding the spatial extent of the Roman settlement. The programme of trial trenching undertaken in this area for the Project has confirmed the Roman date for the features recorded on aerial photographs and through geophysical survey, and has identified not just buildings but other activities including both inhumation and cremation burials.
1070	Protection of Sansom's Platt	On this misleading basis, the developers then build a case for solar panels on and directly next to, fields with proven archaeological remains. It therefore aligns with their narrative that development can take place right next to the currently protected area with no regard for the setting. I again reference The Ancient Monuments and Archaeological Areas Act 1979 <i>"protection extends not just to known structures or remains but also to the soil under or around them and any adjacent land which is essential to support or preserve the monument"</i> .	The Illustrative Masterplan for the Project clearly demonstrates the careful design in the area of Sansom's Platt 4 (ES Figures 2.1a - 2.4c - Illustrative Masterplan - Rev 1 [AS-020]). As a result of the programmes of archaeological work, a considerable area of land (around 17.5 hectares in total) has been removed from the developable site and will be maintained as managed grassland. This includes land to the north, west, south-west and south-east of the Scheduled Monument and covers all archaeological features related to the Roman settlement. The removal of solar PV panels and associated infrastructure from these areas of land protects the setting of the Scheduled Monument. It also protects the buried archaeological remains themselves, as currently these remains are subject to degradation and damage through arable farming, which would cease following construction of the solar farm. As stated

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		I have an aerial photo from Blenheim's own Geophysical Survey Report carried out by Magnitude Surveys in January 2022. The numerous red dots and lines indicate further buildings and roads all part of Sansom's Platt and which will be directly adjacent to solar panels in Area 3. Referencing the developers maps - with a Roman Villa in Area 1, a protected National Monument Roman Town site in Area 2, a continuation of the Roman Town in Area 3 and another sizeable continuation of the town as evidenced by the red dots and lines there is no justification for any development in field area 3 or surrounds. This is proof of far more than the developers claim of <i>"possible a small settlement containing 'several' buildings"</i> All these facts totally negate the developers claim: <i>"The design of the Project considers the settings of designated heritage assets and in each case seeks to preserve those elements of the setting that make a better contribution to the asset (or which better reveal its significance)"</i>. Furthermore, by crowding this area with solar panels, the developers also ignore Historic England's ruling <i>'All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not'</i> (Historic England 2017, page 2).	above, these area would instead become managed grassland and therefore no further damage would occur as a result of arable farming. Thus the Applicant's position is very different to that inferred by the Relevant Representation, which perceives a narrative in which the development <i>'can take place right next to the currently protected area with no regard for the setting'</i>. The reality is that the Applicant is very much aware of the requirement to have due regard to the setting of the Scheduled Monument and has designed the development in a responsible manner.
1070	Significance of assets and cumulative effects	Their submission under <i>'Applicants should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting towards that significance'</i> concludes: <i>'No significant cumulative effects have been identified'</i> and <i>'a total of 42 areas containing significant buried and archaeological remains have been avoided and sufficiently buffered within the project design'</i>. Not so in the Northern Sector.	It is not entirely clear which aspects of the application documents are being discussed here. The first quotation relates to the requirement through national policy to consider the significance of heritage assets and the contribution that their setting makes to that significance. The Applicant has addressed this in ES Appendix 7.5: Settings assessment [APP-142]. The second quotation appears to be related to the cumulative effects assessment, which for the historic environment is presented in Section 7.10 of ES Chapter 7: Historic environment [CR1-003]. The third quotation relates to the 42 (actually now 44) areas containing significant archaeological remains that have been removed from the developable land and would instead be retained as managed grassland within the Project. Of these 44 areas, a total of six are located within the Northern Site Area, including the large area around the Scheduled Monument at Sansom's Platt. This is set out in ES Figures 2.1a - 2.4c - Illustrative Masterplan - Rev 1 [AS-020].
1070	Categorisation of heritage assets, setting and harm	"The historic landscape within the Northern Site Area and the Central Site Area forms part of the setting of the Blenheim Palace WHS. This association enhances the sensitivity/value of the character of the historic landscape in these areas, which is therefore considered to be medium'. Response: Again, the developers play down the significance and value of the Northern Site. This arbitrary 'medium' category is completely at odds with the value and protection UNESCO and all Heritage and environmental Agencies place on the	Here the Relevant Representation provides a (partial) quotation from paragraph 7.9.76 of ES Chapter 7: Historic environment [CR1-003]. This part of the assessment concerns the character of the overall historic landscape, not the contribution that the setting of a heritage asset contributes towards the significance of that asset. The character of the historic landscape of almost all of the land within the Order Limits represents the results of formal enclosure during the post-medieval and early modern periods, with some subsequent boundary loss leading to the establishment of larger fields. As such it is typical of much of Oxfordshire and would usually be ascribed a 'low' value in the assessment process. However, as set out in the assessment, the association of the

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		importance of the setting of designated heritage assets. This has been referenced in above sections but a single reminder is the UK’s ratification of the UNESCO 1972 convention: National Protection and International Protection of the Cultural and Natural Heritage – Articles 4 & 5 which references the responsibility of the State to protect all Heritage sites ‘known or suspected and their settings’. Indeed, Historic England go as far as to give an Aesthetic value to an Historic site: “Value deriving from the ways in which people draw sensory and intellectual stimulation from a place”. (Conservation Principles. Heritage Definitions 2008.) The developers also ignore Historic England’s ruling ‘All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not’ (Historic England 2017, page 2) In law there is no ‘medium level’ only complete protection of the settings of Heritage sites.	historic landscape within the Northern and Central Site Areas with the Blenheim Palace World Heritage Site enhances its value which then becomes ‘medium’. This is not an arbitrary category, rather it is one which is defined within the methodology set out in ES Chapter 7: Historic environment [CR1-003]. The Applicant would again refer to the national planning policy in England as set out in the National Planning Policy Framework (NPPF) and the suite of National Policy Statements. These policies contemplate the World Heritage Convention through their recognition of the need to assess impacts on World Heritage Sites. The Applicant does not make any claims in respect of a ‘medium level’ of protection in terms of the legislation. However, planning policy acknowledges that development within the settings of heritage assets could result in harm to the significance of such assets, and seeks to examine that harm against the public benefits of the proposed development. The degree of harm needs to be articulated, along with the public benefits.
1070	Blenheim’s World Heritage Status	The developers assert (7.9.52) “No part of the site is located within the defined boundary of the Blenheim Palace WHS”. This is wrong. In the Queen Act of 1705 (I visited the House of Lords Library to read through this Act) the lands given to the first Duke of Marlborough and his heirs included the Wootton area, Hordley, Handborough (sic), Stonesfield and Combe. These areas were then referred to in ‘The Master’s Report’ of the 18th Feb 1825 and re-stated in detail in The Blenheim Estate Act of 23 June 1856 : “The Honour of Woodstock which was settled on the Dukedom of Marlborough by the Act of Queen Anne, comprises the Manors of Hordley, Wootton, Old Woodstock, Handborough (sic), Stonesfield, Combe and Bladon.” Thus the total Blenheim Estate has been established in the Northern Area since 1705 with two further references. Blenheim, upon gaining WHS, confirmed this extent of their Estate in 2017 and, in order to fulfil to UNESCO its World Heritage status, a Site Management Plan was drawn up stating : “It has been prepared in line with both International and National policy and guidance, including the National Planning Policy Framework, Circular 07/2009 on the Protection of World Heritage Sites, the Operational Guidelines for the Implementation of the World Heritage Convention; Historic England (formerly English Heritage) guidance ‘The Setting of Heritage Assets’, and ‘Seeing the History in the View’ and most recently GPA3 ‘The Setting of Heritage Assets’. The document has also benefited from studying the way in which this subject has been considered by	As stated above, the boundary of the Blenheim Palace World Heritage Site is clearly identified on drawings that were prepared at the time that it was first inscribed on the World Heritage List (1987). The location of the Order Limits for the Project in relation to the boundary of the World Heritage Site is indicated on Figure 1.1 in ES Appendix 7.4, Blenheim Palace World Heritage Site - Heritage Impact Assessment [APP-141]. No part of the Project Site is within the defined boundary of the World Heritage Site. Land outside of the defined boundary of the World Heritage Site may form part of its setting, but that is not the same as being within the World Heritage Site. Land owned by Blenheim Estates outside the defined boundary of the World Heritage Site could be considered to be part of the setting of the World Heritage Site as a result of the association with the dukes of Marlborough. However, the extent of the ownership has changed over the centuries since the establishment of Blenheim Palace, as land was purchased and sold (and on some occasions repurchased), so ownership should not be seen as the sole criterion for inclusion within the setting.

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		other World Heritage Sites in the UK.” The plan, following the 1705,1825 and 1856 Acts of Parliament, again confirmed no differentiation between the immediate Palace surrounds and the wider countryside owned by Blenheim: “the extent of setting is not fixed it does not have a fixed boundary and cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset.” It continues “One of the key characteristics of the surroundings of Blenheim Park is that much of the setting lies within the wider extent of the Blenheim estate - which is effectively managed by a single owner. It has been owned by the Dukes of Marlborough for 300 years (one of the attributes which contribute to OUV), and has in recent years been recognised as an outstanding property of national heritage value. Thus for almost 300 years, management of the wider estate has acted as a means of both supporting the historic core and protecting it.” Blenheim assured UNESCO (and the UK Government as a member State) that the Blenheim Estate, in its entirety, is subject to UNESCO rules which include “The manager’s (of a World Heritage site) aim must be the continuing sustainable use of the landscape, whether urban or rural, while keeping what is important from the past,” and specifically identified Solar Farms which could “detrimentally influence the character of the adjoining rural area.” In light of this correct definition of the total of the WHS how interesting and self-defeating it is, that under (7.9.52) ‘Sensitivity/value of the receptor’, the developers put the sensitivity/ value of the Blenheim Palace WHS as very high.	
1070	Assets withing the setting of the WHS	In Table 7.15 Impact of The Project on designated heritage assets: Sansom’s Platt Roman Villa (again a description providing a complete misrepresentation of the area) NHLE No: 1006346 Scheduled Monument, the sensitivity is put at High which must be coupled with its ‘Very High’ status as part of the Blenheim WHS ! But, the developers rate the sensitivity / value of the character of historic landscapes at medium. The developers are in chaos with their understanding of the protection the Northern Area commands.	As set out above, the Scheduled Monument at Sansom’s Platt is described on the National Monuments List for England as a Roman villa, hence this is how it appears in Table 7.15 in ES Chapter 7: Historic environment [CR1-003]. This is not a misrepresentation of the area; more detailed information on the nature of the archaeological remains at Sansom’s Platt (both within and outside of the Scheduled Monument) is provided in ES Appendix 7.1: Historic environment desk-based assessment [APP-131], ES Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology [APP-132] and ES Appendix 7.3: Geophysical survey report [APP-133 – APP-140]. It does not follow that all heritage assets within the setting of the Blenheim Palace World Heritage Site should share the ‘Very High’ value of the World Heritage Site within the assessment process. Each heritage asset should be judged on its own merits, including the contribution that it makes to the significance of the World Heritage Site. The Scheduled Monument at Sansom’s Platt does not make any contribution towards the significance of the World Heritage Site, but as a Scheduled

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			Monument it is ascribed a high level of value. The character of the historic landscape would be ascribed a low level of value, but its association with the World Heritage Site means that this is elevated to a medium level of value. This is part of a considered and accepted methodology for the assessment of impacts and effects.
18, 272, 579, 913, 983	Impact on the historic village of Cassington	General concerns regarding the impact of the Project on the historical significance of the village of Cassington and its built heritage assets including the Conservation Area	A detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Conservation Area at Cassington is presented within paragraphs 1.9.119 – 1.9.125 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment included a review of visualisations from Viewpoints 40 and 42 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 40 (looking north west from footpath 152/6/10) are (looking north from the A40) presented as Figures 8.340 – 8.343 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 7 of 9 [APP-078]. The visualisations from Viewpoint 42 are presented as Figures 8.348 – 8.351 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 8 of 9 [APP-079]. The assessment concludes that the heritage significance of the Conservation Area would be slightly harmed, leading to a long-term (time-limited), reversible 'minor adverse' effect. This effect is not significant in EIA terms. A detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Grade I listed Church of St Peter at Cassington is presented within paragraphs 1.9.32 – 1.9.34 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment included a review of visualisations from Viewpoints 42 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 42 are presented as Figures 8.348 – 8.351 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 8 of 9 [APP-079]. The Applicant's detailed assessment presented within paragraphs 1.9.32 – 1.9.34 of ES Appendix 7.5: Settings Assessment [APP-142] concludes that the Project would not preclude any existing views towards the church and the spire would remain visible as at present. However, elements of the Project would be visible behind and adjacent to the church tower in some views and consequently the setting of the church as experienced in these views would change. The greatest part of the heritage significance of the church lies in its historical and evidential values, with the potential recovery of information retrieved through examination of the fabric of the building or relevant documentary sources. These values would not be affected in any way by the Project. The setting of the church makes a reasonable contribution to its heritage significance, especially the enclosing churchyard and the associated burial monuments. The relationship between the church and the churchyard would not be affected by the Project. The heritage significance of the church would be barely affected as a result of the change within its setting, resulting in a 'negligible adverse' magnitude of impact and a 'minor adverse' effect that would be long-term (time-limited) and fully reversible. This is not significant in EIA terms.
75, 161, 182, 205, 327, 388, 534, 536, 542, 611, 814, 1010	Impact on the historic village of Cumnor	General concerns are raised in these RRs regarding the impact of the Project on the historical	A detailed assessment of the likely impacts and effects of the Project on heritage assets as a result of change within their setting is presented within

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		significance of the village of Cumnor and its built heritage assets including the Conservation Area, proximity of the proposed permanent National Grid substation.	ES Appendix 7.5: Settings Assessment [APP-142]. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>. The assessment included a scoping exercise through which designated heritage assets were scoped into, or out of, the detailed assessment. The existence of a direct visual connection between the heritage asset and the Project was the principal issue used to decide which designated heritage assets were scoped in and which were scoped out. This does not mean that other issues were not also considered, but visibility is usually the most important. This is noted in paragraph 10 of the 2017 Historic England guidance document which states '<i>The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset</i>'. Whilst it is possible for the significance of a heritage asset to be harmed by change within its setting despite a complete lack of intervisibility, this is rare and the outcome in terms of impact and effect is very unlikely to be significant. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach is necessary. The Cumnor Conservation Area was scoped out of the detailed assessment presented in ES Appendix 7.5: Settings Assessment [APP-142] on the basis that the Project Site does not form any part of the setting of the Conservation Area. The location of the Conservation Area in relation to the Project Site is indicated on Figure 3c in ES Appendix 7.1: Historic environment desk-based assessment [APP-131] and is described in paragraphs 1.5.50 – 1.5.52 of that document. The Conservation Area is focused on the historic village core but also spreads out along the main roads as a result of a dispersed pattern of historic farms being located on these routes. The key contributions towards the heritage significance of the Conservation Area come from the historic buildings within the village core, the relationships between these buildings and the spaces which divide and enclose them. The wider rural setting of the Conservation Area makes some contribution towards its heritage significance. Map 4 in the 2011 Cumnor Conservation Area Appraisal shows the location and direction of 'Important Views' into and out of the Conservation Area. There are no identified 'Important Views' towards the Project Site, and indeed no part of the Project Site would be visible in views out of the Conservation Area. The NGET Substation has been part of the LVIA Assessment set out in Chapter 7 of the ES [APP-045] which considered the visual impact both if built within the site, or on the land immediately adjoining to the west. Where relevant, the location and likely scale of the National Grid Substation have been included within the assessment of likely impacts and effects presented in ES Appendix 7.5: Settings Assessment [APP-142]. This substation is mentioned in the assessment regarding Red House Farmhouse (paragraphs 1.9.95 – 1.9.97), Upper Whitely Farmhouse (paragraphs 1.9.98 – 1.9.100) and also Tumbledown Cottage (paragraphs 1.9.131 – 1.9.134).
566, 579, 771, 862	Impact on the historic village of Church Hanborough	General concerns regarding the impact of the Project on the historical significance of the village of Church Hanborough and its built heritage assets including the Conservation Area	The Applicant's detailed assessment of the likely impacts and effects of the Project on the Church Hanborough Conservation Area is presented in paragraphs 1.9.115 – 1.9.118 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment found that ' <i>The Conservation Area extends</i>

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			<i>beyond the historic settlement core, taking in adjacent land in most directions. To the north this extends to the edge of Pinsley Wood, whilst to the west the Conservation Area extends to the parish boundary. Essentially this means that the Conservation Area takes in much of the immediate setting of the historic core of the settlement. The Conservation Area has a separate setting which takes in farmland in all directions. In most of these there is nothing in terms of heritage significance to distinguish between the farmland within the Conservation Area and that which is outside the designation boundary. Overall, this wider setting makes some contribution to the heritage significance of the Conservation Area.</i> The construction of the Project would see the placement of solar PV panels to the north, east and south of the Conservation Area. One piece of land in the eastern part of the Conservation Area is actually within the Order Limits for the Project, although no development is proposed here and the land would be retained as managed grassland. Elements of the Project, including solar PV panels, would be visible in views out of, towards and across the Conservation Area, but not in views out of, towards or across the historic core of the settlement other than views in which the tall spire of the church is visible. The assessment concluded that the heritage significance of the Church Hanborough Conservation Area would be slightly harmed as a result of the change within its setting. This represents an impact of 'low adverse' magnitude resulting in a long-term (time-limited), reversible 'minor adverse' effect. This is not significant in EIA terms. The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough is presented within paragraphs 1.9.27 – 1.9.31 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment included a review of visualisations from Viewpoints 27 and 38 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 27 are presented as Figures 8.312 – 8.315 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 5 of 9 [APP-076]. The visualisations from Viewpoint 38 are presented as Figures 8.336 – 8.339 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 7 of 9 [APP-078]. The Applicant's detailed assessment presented within paragraphs 1.9.27 – 1.9.31 of ES Appendix 7.5: Settings Assessment [APP-142] concludes that the Project would not preclude any existing views towards the church and the spire would remain visible as at present. However, elements of the Project would be visible in the foreground and middle ground in such views and consequently the setting of the church as experienced in these views would change from the predominantly rural situation as at present. The greatest part of the heritage significance of the church lies in its historical and evidential values, with the potential recovery of information retrieved through examination of the fabric of the building or relevant documentary sources. These values would not be affected in any way by the Project. The setting of the church makes a reasonable contribution to its heritage significance, especially the enclosing churchyard and the associated burial monuments. The relationship between the church and the churchyard would not be affected by the Project. The heritage significance of the church would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact and a long-term (time-limited),

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			reversible 'minor adverse' effect. This is not a significant effect in EIA terms.
102, 103, 229, 1004	Impact on the historic village of Bladon	General concerns regarding the impact of the Project on the historical significance of the village of Bladon and its built heritage assets including the Conservation Area	The Applicant's detailed assessment of the likely impacts and effects of the Project on the Bladon Conservation Area is presented in paragraphs 1.9.106 – 1.9.110 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment found that '<i>The Conservation Area takes in the linear historic settlement core and a small amount of adjacent farmland on the eastern side. Whilst the boundary of the Conservation Area within this farmland appears quite arbitrary, it nevertheless serves to link the historic settlement core with the land to the east as it rises up towards Bladon Heath. The setting of the Conservation Area makes some contribution to its significance, with the key element being Blenheim Park immediately to the west</i>'. Construction of the Project would see the placement of solar PV panels to the east and south of Bladon. A buffer zone has been established so that there is clear separation between the Conservation Area and any areas of panels, and land within this buffer zone would be maintained as grassland or similar. New hedgerows would be planted around the perimeter of the developed part of the proposal site to screen views of the solar PV panels and associated elements of the solar farm. However, this screened perimeter would be clearly visible within a number of 'significant views' which are identified in a 1990 Conservation Area Character Appraisal. The relationship between the Conservation Area and Blenheim Park would remain unchanged. The assessment concluded that the heritage significance of the Bladon Conservation Area would be slightly harmed as a result of the change within its setting. This represents an impact of 'low adverse' magnitude resulting in a long-term (time-limited), reversible 'minor adverse' effect. This is not significant in EIA terms.
102, 272, 403, 411, 491, 634, 645, 718, 799, 919, 973, 978, 1021	Impact on the Church of St Martin, Bladon and the grave of Sir Winston Churchill in the churchyard	General concerns regarding the impact of the Project on the historical significance of the Church of St Martin at Bladon and the grave of Sir Winston Churchill in the churchyard	The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Grade II listed Church of St Martin at Bladon as a result of change within its setting is presented within paragraphs 1.9.119 – 1.9.125 of ES Appendix 7.5: Settings Assessment [APP-142]. The setting of the church is described thus '<i>Like most churches, its immediate setting comprises the churchyard which contains a number of Grade II listed tombs and headstones as well as the graves of Sir Winston Churchill and other members of the Churchill family. There is a further association with Blenheim Palace as a result of the tower of the church being one end of the principal design axis for the park and palace. The setting makes a reasonable contribution to the heritage significance of the church, with the greatest contribution coming from the enclosing churchyard and the association with Blenheim Palace and its designed landscape</i>'. Construction of the Project would see the placement of solar PV panels to the fields to the north east, east and south of Bladon. A buffer zone has been established so that there is clear separation between the settlement and any areas of panels, and land within this buffer zone would be maintained as grassland or similar. New hedgerows would be planted around the perimeter of the developed part of the proposal site to screen views of the solar PV panels and associated elements of the solar farm. No part of the Project would be visible in views towards the church from within the Blenheim Palace WHS, including the view along the principal design axis from the centre of the Palace. This point regarding lack of visibility is

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			evidenced in greater detail in ES Appendix 7.4: Heritage Impact Assessment [APP-141]. The assessment concluded that there would be no change to the heritage significance of the Church of St Martin as a result of the change within its setting. The same would apply to the heritage significance of the grave of Sir Winston Churchill.
116, 207, 229, 592, 833, 919	Impact on the historic town of Woodstock	General concerns regarding the impact of the Project on the historical significance of the town of Woodstock and its built heritage assets including the Conservation Area	A detailed assessment of the likely impacts and effects of the Project on heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment [APP-142]. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>. The assessment included a scoping exercise through which designated heritage assets were scoped into, or out of, the detailed assessment. The existence of a direct visual connection between the heritage asset and the Project was the principal issue used to decide which designated heritage assets were scoped in and which were scoped out. This does not mean that other issues were not also considered, but visibility is usually the most important. This is noted in paragraph 10 of the 2017 Historic England guidance document which states '<i>The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset</i>'. Whilst it is possible for the significance of a heritage asset to be harmed by change within its setting despite a complete lack of intervisibility, this is rare and the outcome in terms of impact and effect is very unlikely to be significant. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach is necessary. The Woodstock Conservation Area was scoped out of the detailed assessment presented in ES Appendix 7.5: Settings Assessment [APP-142] on the basis that no part of the Project Site is visible in views from the Conservation Area. The location of the Conservation Area in relation to the Project Site is indicated on Figure 3a in ES Appendix 7.1: Historic environment desk-based assessment [APP-131] and is described in paragraphs 1.5.45 – 1.5.47 of that document.
18, 217, 254, 286, 288, 336, 386, 522, 569, 794, 919, 927, 1007, 1011, 1051, 1090	Impact on the historical significance of the city of Oxford	General concerns regarding the impact of the Project on the historical significance of the city of Oxford and its built heritage assets including the Conservation Area	A detailed assessment of the likely impacts and effects of the Project on heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment [APP-142]. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document The Setting of Heritage Assets. The 2 km study area for the assessment of impacts arising from changes within the settings of heritage assets was established through consultation with relevant stakeholders, commencing with the Scoping stage of the Environmental Impact Assessment (EIA). As set out in paragraph 1.3.1 of ES Appendix 7.5: Settings Assessment [APP-142], designated heritage assets beyond 2 km were considered if they fell within the Zone of Theoretical Visibility (ZTV) for the Project and had designed views towards the proposed development or a particular iconic status that could be affected by the proposed development.

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			The city of Oxford was not identified by the Applicant as a heritage asset requiring detailed assessment, nor was it identified as such by any consultee or stakeholder during the consultation process. The Applicant acknowledges that the city is visible in views from certain parts of the Project Site. However, the historic core of the city is around 4.5 km from the nearest part of the Southern Site and around 7.5 km from the nearest part of the Central Site, and even further from any of the elevated locations within the Project Site from which the city is actually visible. In all of the views towards the city of Oxford from within the Project Site, other more recent developments are visible in front of the historic core. Depending on the location of the viewpoint, these include not just more recent residential areas but also major highways on raised embankments, the city airport, and major developments such as the Oxford Science Park. The addition of solar panels and hedgerow planting in the foreground of any view from within the Project Site towards the city of Oxford is unlikely to have any impact on the heritage significance of the Oxford Central (University and City) Conservation Area or any of the heritage assets within that Conservation Area.
322, 442, 579, 723, 1060, 1092	Impact on the Sansom's Platt Scheduled Monument	Specific concerns regarding the impact of the Project on the Scheduled Monument at Sansom's Platt	The Scheduled Monument at Sansom's Platt is outside of the Order Limits for the Project. Archaeological surveys undertaken for the Project, including geophysical surveys and trial trenching, have established that important buried archaeological remains associated with the Scheduled Monument extend beyond the Scheduling boundary and into the Project Site. The results of the geophysical surveys are set out in ES Appendix 7.3: Geophysical survey report Parts 1-8 [APP-133 – APP-140]. The reports on the results of the programme of trial trenching are being prepared and will be submitted into the Examination as soon as possible. As a consequence of the archaeological surveys undertaken for the Project, the design of the Project has been adjusted to leave a substantial buffer zone between the Scheduled Monument and any developed part of the Project. This is set out in Figures 2.1b and 2.1c in ES Figures 2.1a - 2.1c - Illustrative Masterplan – Rev 1 [AS-020]. The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Scheduled Monument at Sansom's Platt as a result of the change within its setting is presented within paragraphs 1.9.4 – 1.9.14 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment included a review of visualisations from Viewpoints 9 (looking north from footpath 379/1/10 near Sansom's Cottage), 10 and 11 (both looking West on the Oxfordshire Way) which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 9 are presented as Figures 8.264 – 8.267 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 2 of 9 [APP-073]. The visualisations from Viewpoint 10 are presented as Figures 8.268 – 8.271 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 2 of 9 [APP-073]. The visualisations from Viewpoint 11 are presented as Figures 8.272 – 8.275 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 3 of 9 [APP-074]. The Applicant's detailed assessment presented within paragraphs 1.9.4 – 1.9.14 of ES Appendix 7.5: Settings Assessment [APP-142] concludes that the likely impact would be greatest at the time of construction, reducing

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			over time as new planting designed to screen views of the proposed development reaches maturity. The greatest part of the heritage significance of the Scheduled Monument lies in its evidential values, with the potential recovery of information retrieved through examination of the buried archaeological features. These values would not be affected in any way by the Project. The setting of the Scheduled Monument makes some contribution towards its heritage significance, especially the presence of the Roman road (Akeman Street) which is directly adjacent to the Scheduled area. The relationship between Akeman Street and the Scheduled Monument would not be affected by the Project. The heritage significance of the Scheduled Monument would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact and a long-term (time-limited), reversible 'minor adverse' effect. This is not significant in EIA terms.
579, 973	Impact on the Bladon Camp Scheduled Monument	Specific concerns regarding the impact of the Project on the Scheduled Monument known as Bladon Camp	A detailed assessment of the likely impacts and effects of the Project on heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment [APP-142]. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>. The assessment included a scoping exercise through which designated heritage assets were scoped into, or out of, the detailed assessment. The existence of a direct visual connection between the heritage asset and the Project was the principal issue used to decide which designated heritage assets were scoped in and which were scoped out. This does not mean that other issues were not also considered, but visibility is usually the most important. This is noted in paragraph 10 of the 2017 Historic England guidance document which states '<i>The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset</i>'. Whilst it is possible for the significance of a heritage asset to be harmed by change within its setting despite a complete lack of intervisibility, this is rare and the outcome in terms of impact and effect is very unlikely to be significant. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach is necessary. The Scheduled Monument known as Bladon Camp was scoped out of the detailed assessment of likely impacts and effects of the Project on the heritage significance of designated heritage assets (ES Appendix 7.5: Settings Assessment [APP-142]). This is because it is totally surrounded by an extensive area of woodland which precludes any views from or towards the proposed solar farm. In their Relevant Representation [RR-0398], Historic England (who are the principal consultee with regard to the likely impacts of the proposed development on designated archaeological remains (i.e. Scheduled Monuments) and their settings) did not raise any issues regarding Bladon Camp being scoped out of the detailed assessment of likely impacts and effects on the heritage significance of designated heritage assets.
356	Impact on the Grade II listed former farmhouse known as Spring Hill	Specific concern regarding the impact of the Project on the Grade II listed former farmhouse known as Spring Hill	A detailed assessment of the likely impacts and effects of the Project on heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment [APP-142]. This assessment was

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			undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>. The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Grade II listed former farmhouse known as Spring Hill is presented in paragraphs 1.9.64 - 1.9.67 of ES Appendix 7.5: Settings Assessment [APP-142]. The setting of the former farmhouse was identified thus: '<i>The immediate setting of the former farmhouse comprises the other former farm buildings within the complex here. These are of varying dates but do not detract from the overall aesthetics. There is also a much wider setting as the elevated location of the former farmhouse provides extensive views out across the valley of the River Evenlode, extending as far as the spire of the Church of St Peter and St Paul at Church Hanborough. The view is one of a rural landscape, with fields predominantly in arable use and separated by hedgerows. The historic route between Cassington and Bladon known as Frogwelldown Lane is less than 200 m to the west of the former farmhouse. Overall, the setting of the listed building makes some contribution to its significance</i>'. The assessment of likely impacts and effects included a review of visualisations from Viewpoint 34 (looking west from footpath 420/14/10 at Spring Hill) which shows existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 4 are presented as Figures 8.328 – 8.331 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 6 of 9 [APP-077]. The assessment found that in views from Spring Hill there would be visibility of solar PV panels in the distance, but a substantial area between the listed building and the solar PV panels would remain outside the Project and the relationship with Frogwelldown Lane would not be altered. The heritage significance of the Grade II listed building would be 'barely harmed', resulting in a 'negligible adverse' effect that would be time-limited and fully reversible. This is not significant in EIA terms.
897	Impact on a Roman road	Specific concern about the impact of the Project on a Roman road which runs through a field earmarked for panel installation	The Applicant is not aware of any Roman road within a field that would be developed as part of the Project. The Roman road known as Akeman Street is located adjacent to the Order Limits for the Project. The location of this Roman road is indicated on Figure 4d in ES Appendix 7.1: Historic environment desk-based assessment [APP-131]. A second Roman road is also indicated on that figure, passing to the east of the Northern Site Area. Neither of these Roman roads would be physically impacted by the construction of the Project.
252, 1040	Impact on Dornford Lane	Specific concerns regarding the impact of the Project on Dornford Lane	No part of Dornford Lane would be removed or physically impacted during the construction, operation and maintenance, or decommissioning of the Project. Areas of solar panels would be established in fields on either side of the road. The potential impacts of the Project upon all sensitive Landscape and Visual Resources and receptors, within the 5 km study area, including the available views from local Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. Existing vegetation along both sides of Dornford Lane would be retained as part of the Project. Where there are breaks in this vegetation, it is acknowledged that there would be near distant views to a small part of the

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			Project available from Dornford Lane. However, for the majority of Dornford Lanes length there would be limited intervisibility. Project Impacts will be minimised against by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. This includes hedgerow reinforcement and tree planting in places adjacent to Dornford Lane. The outline Public Rights of Way Management Plan [APP-232] includes indicative management measures to manage PRoW during the construction phase where vehicles may need to cross Dornford Lane to access the fields on either side of it.
1051	Impact on non-designated historic landscapes	Specific concerns regarding non-designated historic landscapes at Hordley and Lower Dornford	As part of the development of the scheme design following the consultation on the Preliminary Environmental Information Report (PEIR), the area of solar PV panels in the field to the south-east of the Grade II* listed Hordley House was reduced in order to minimise any potential intervisibility with the house or any location within its grounds The proposed layout is shown on Figures 2.1b and 2.1c in ES Figures 2.1a - 2.4c - Illustrative Masterplan [AS-020]. The detailed assessment of likely impacts on the heritage significance of Hordley House is presented in paragraphs 1.9.35 – 1.9.38 of ES Appendix 7.5: Settings Assessment [APP-142]. This sets out information regarding the heritage significance of the house and examines the setting of the houses, concluding that <i>'The setting makes some contribution to the heritage significance of the former farmhouse, with the greatest contribution coming from the grounds of the property'</i>. The assessment found that the heritage significance of the house would be barely affected, resulting in a likely impact of 'negligible adverse' magnitude leading to a long-term, reversible 'minor adverse' effect which is not significant in EIA terms. Any separate assessment of the likely impacts specifically on the grounds of Hordley House would conclude that effect would be less than for the house itself. This is because the grounds are important for what they contribute towards the significance of the house rather than in their own right. As part of the development of the scheme design following the consultation on the PEIR, the area of solar PV panels in the fields to the east of the group of Grade II listed buildings at Lower Dornford Farm was reduced in order to reduce or minimise any potential intervisibility with the buildings. The proposed layout is shown on Figure 2.1b in ES Figures 2.1a - 2.4c - Illustrative Masterplan [AS-020]. The detailed assessment of likely impacts on the heritage significance of the group of Grade II listed buildings at Lower Dornford Farm is presented in paragraphs 1.9.45 – 1.9.50 of ES Appendix 7.5: Settings Assessment [APP-142]. A description of the history of the site is provided in paragraph 1.9.46 and this includes commentary regarding the potential association with the 18th century landscape garden designer Lancelot 'Capability' Brown. The assessment found that the heritage significance of the group of Grade II listed buildings would be barely affected, resulting in a likely impact of 'negligible adverse' magnitude leading to a long-term, reversible 'minor adverse' effect which is not significant in EIA terms. If the association with designer Lancelot 'Capability' Brown was proven, and elements of the historic landscape could be definitely ascribed to him, any separate assessment of the likely impacts of the proposed development on such

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			features would conclude that the effect would be no greater than for the group of Grade II listed buildings. This is because the scheme design has ensured clear separation from the heritage assets (including any possible designed landscape element) and the existing field boundary would be reinforced with new planting, including trees, which will help to screen the solar PV panels in views from or across the heritage assets.
248	Loss of a historic building	Specific concern regarding the removal of the remains of a barn.	No historic farm buildings would be removed for the construction, operation and maintenance, or decommissioning of the Project.
16. Human Health			
5, 6, 24, 30, 34, 63, 70, 72, 117, 126, 128, 137, 161, 169, 208, 217, 220, 229, 230, 235, 242, 249, 252, 257, 260, 262, 264, 281, 282, 285, 287, 292, 296, 298, 309, 311, 329, 333, 341, 366, 386, 388, 393, 394, 407, 451, 481, 488, 536, 545, 549, 610, 630, 638, 691, 711, 727, 729, 746, 747, 750, 755, 758, 810, 829, 872, 901, 908, 912, 928, 939, 940, 950, 957, 969, 1001, 1021, 1023, 1037, 1044, 1055, 1058, 1079, 1099, 1104	General health	General concerns regarding the potential impacts of the Project on human health, including mental and physical wellbeing, as a result of construction and operational activities.	We acknowledge concerns arising with regard to the potential impacts of the Project on community health and wellbeing, including health inequalities. The impact of the Project on health and wellbeing is considered in Volume 1: Chapter 16: Human Health of the ES [APP-053], which assesses a wide range of health determinants, including physical and mental health outcomes. Chapter 16: Human Health follows relevant guidance, including by the Institute of Environmental Management and Assessment (IEMA), and consultation has been undertaken with national and local public health authorities. Chapter 16 concludes that there will be several minor beneficial (not significant) effects on population health as a result of the Project, and moderate beneficial (significant) health effects as a result of improvements to employment and education opportunities and contribution to wider societal infrastructure. Chapter 16 identifies the potential for one short-term significant adverse effect in relation to use of the public rights of way network at the start of the operational phase, see the response under the theme of 'Access to open space, public rights of way, recreation, and physical activity'. Monitoring is proposed to confirm outcomes and provide additional route promotions if required. There are adopted measures to encourage use of the routes, which include information boards and signage, as well a new route connecting Church Hanborough and Cassington. Other potentially adverse effects of the project are also assessed, and it is concluded that none would give rise to significant adverse population health effects, including for vulnerable groups. A key public health enhancement is the commitment to an educational area for school trips. The precise location and design are to be developed with the community. Further detail is set out in the Outline Operational Management Plan [APP-234] and Figure 16.2 - Illustrative 3D Views of Educational Facility [APP-107]. Mitigation measures adopted as part of the Project pertaining to human health are outlined in Section 16.8 of the ES chapter [APP-053]. A significant public health benefit of the Project is that the Project provides renewable energy security (paragraph 16.9.239 [APP-053]).
2, 5, 6, 24, 30, 34, 63, 64, 70, 73, 117, 126, 128, 169, 192, 208, 220, 229, 230, 235, 242, 257, 260, 272, 281, 282, 285, 287, 292, 296, 311, 329, 333, 334, 342, 343, 359, 366, 385, 388, 407, 429, 431, 446, 451, 461, 462, 477, 479, 481, 491, 528, 531, 532, 536, 549., 553, 569, 571, 589, 603, 610, 624, 630, 631, 638, 639, 641, 651, 703, 711, 719, 727, 733, 746, 750, 753, 755, 758, 810, 829, 868, 869, 872, 876, 887, 901, 911, 912., 915, 917, 926, 928,	Mental health	Concerns regarding the potential for adverse effects on mental health and wellbeing from the Project.	We acknowledge concerns in relation to the potential impacts of the Project on mental health and wellbeing. The impact of the Project on human health, including mental health and wellbeing, particularly as a result of changes to the visual landscape and access to open green space, is considered in Volume 1: Chapter 16: Human Health of the ES [APP-053]. The primary analysis of landscape effects is set out in Volume 1, Chapter 8: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of PRoW effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRoW [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. The Chapter 16 assessment

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931, 933, 939, 940, 950, 959, 962, 969, 973, 978, 1001, 1037, 1043, 1044, 1055, 1058, 1092, 1095, 1099, 1104, 1105			recognises the importance of mental health and wellbeing in the assessment of public health effects, and mental health is considered throughout the assessment within a wide variety of health determinants. As stated in section 16.1 (Introduction), Chapter 16 includes the WHO definition of mental health when defining health: “a state of mental well-being that enables people to cope with the stresses of life, to realize their abilities, to learn well and work well, and to contribute to their communities”. Specific regard has been given in Chapter 16 to vulnerable population groups, including those with existing pressures on their mental wellbeing, as well as to mental health outcomes that may be associated with the Project’s impacts. With regard to community concern about the Project and associated mental health effects, the Environmental Statement assessments deliver the statutory requirement to set out the likely significant effects of the Project. The availability of such information, including on human health in the non-technical summary [APP-037], supports the community understanding of the likely project impacts and outcomes. Availability of such information is an important factor in supporting population mental health, including in relation to concerns that may arise during the application determination process. Further to this, public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. These include continued community consultation and sharing of non-technical information relating to the Project to allow people to express concerns and gain awareness of actual health effects. This measure is supportive of community mental health and wellbeing as the Project progresses. Additionally, as there can be community concern around electrical infrastructure, notwithstanding that it would be within health protection standards, section 16.9 (Public understanding of EMF risk) [APP-053] assesses public understanding of risk in relation to operational EMF and concludes the Project should not result in any significance adverse impact on public health, including for vulnerable groups.
2, 5, 6, 24, 63, 128, 130, 137, 143, 148, 155, 159, 169, 177, 178, 182, 191, 196, 200, 210, 207, 208, 220, 229, 242, 262, 287, 296, 333, 329, 429, 549, 630, 641, 655, 667, 703, 711, 750, 912, 919, 921, 928, 978, 1055	Visual impact, community identity, culture, resilience and influence	Concerns regarding potential negative effects on mental health and wellbeing, including stress, anxiety and psychological distress arising from visual changes to the landscape. Concerns also relate to impacts on community identity and resilience.	We acknowledge the concerns regarding the potential impacts of the Project on community identity as a result of visual changes. Chapter 16 section 16.9 (Community identity, culture, resilience and influence) [APP-053] of the Human Health chapter of the ES assesses population health outcomes associated with visual changes to the landscape as a result of the operational solar farm. This includes effects on mental health and wellbeing. Impacts of the Project on Community identity, culture, resilience and influence are assessed as not significant in EIA terms. Inter-related effects on the combined effect of changes to community identity and public understanding of EMF risk are assessed as not significant. The primary analysis of landscape and visual effects are set out in Volume 1, Chapter 8: Landscape and Visual Impact Assessment (LVIA) [APP-045]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Chapter 16 section 16.9 (Community identity, culture, resilience and influence) [APP-053] assesses population health outcomes associated with visual changes to the landscape as a result of the operational solar farm. This includes effects on mental health and wellbeing. The Chapter 16 assessment [APP-053] identifies that the visible changes of the Project most likely to drive any public health effect are those experienced by users of public rights of way adjacent to the Project or crossing the solar arrays. For these effects see the response under the theme of 'Access to open space, Public Rights of Way, recreation, and physical activity'.

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			For the visual community identity impacts, Chapter 16 section 16.9 [APP-053] finds that due to the relatively low height of the Project solar arrays and much of the associated infrastructure, as well as topography and existing vegetative screening, the Project is not visible from private dwellings to an extent that would be likely to significantly affect population health. Similarly, the occasional, distant or partial views from vantage points, or views of a transitory nature, e.g. from roads passing the solar farm, are not of a scale of change likely to significantly affect population health. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Measures include the use of landscaping, in combination with layout and design, to minimise visibility of electrical infrastructure (other than arrays and substations) close to PRowS. Mitigation planting is described in Volume 1, Chapter 8: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out measures to support integrating the Project into the landscape.
2, 5, 6, 30, 34, 55, 63, 64, 72, 117, 126, 128, 130, 154, 161, 169, 192, 207, 229, 235, 248, 253, 260, 272, 281, 282, 285, 287, 292, 298, 309, 329, 333, 334, 341, 359, 366, 385, 386, 388, 393, 407, 429, 431, 446, 451, 454, 457, 462, 477, 479, 481, 488, 528, 531, 536, 545, 549, 553, 554, 569, 571, 589, 610, 630, 638, 639, 641, 651, 691, 711, 719, 727, 729, 733, 746, 750, 755, 758, 775, 810, 849, 855, 869, 876, 878, 887, 911, 915, 917, 919, 926, 928, 931, 934, 940, 957, 962, 969, 973, 978, 1001, 1043, 1044, 1079, 1092, 1095, 1099, 1104,	Access to open space, public rights of way, recreation, and physical activity	Concerns regarding reduced access to public rights of way, open space and the countryside, and potential impacts on recreational use, physical activity, and enjoyment of the natural environment. Some representations also expressed concern about long-term changes to route quality and setting, and how this may affect health and wellbeing.	We acknowledge that there are concerns regarding how the potential impacts of the Project on the setting and use of the public right of way (PRow) network may influence health and wellbeing. These impacts have been assessed in the ES. The primary analysis of landscape effects is set out in Volume 1, Chapter 18: Landscape and Visual Impact Assessment (LVIA) of the Environmental Statement (ES) [APP-045] and the primary analysis of PRow effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume 1, Chapter 16: Human Health [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16 section 16.9 (Open space, leisure and play) [APP-053] assesses population health outcomes associated with changes in open space and recreation. The existing PRow context includes routes that have high hedging on both sides, as well as stretches with more open views. For the health assessment the relevant outcomes relate to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. This means that some stretches would have additional and higher hedges that reduce wider landscape views. The balance of providing appropriate screening has been carefully considered alongside other features to maintain route amenity as set out in the Outline Landscape and Ecology Management Plan [APP-235]. The Chapter 16 assessment [APP-053] discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. The Chapter 16 assessment [APP-053] has been transparent in articulating potential impacts and their potential to affect behavioural change at a population level. The character of parts of the PRow network would change, however the health assessment explains where these changes would be and what approximate durations and alternatives are available for PRow users. The assessment appropriately focuses on the key routes connecting communities and areas where the views are most affected by passing through the solar arrays. Chapter 16 identifies the potential for one short-

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			term significant adverse effect in relation to use of the PRoW network at the start of the operational phase. This effect relates to the potential for behavioural change by a minority of people in the communities close to the project. The effect is driven by actual views of the arrays from PRoW whilst planting matures and also wider public understanding of the project, which we recognise as affecting decisions to use the PRoW irrespective of the actual visual change. The new planting is the key measure that addresses this significant effect, see the Outline Landscape and Ecology Management Plan [APP-235]. In addition to the maturing of the new greenway sections, it is also relevant (and discussed in Chapter 16) that in most cases alternative PRoW sections exist between communities of similar travel time and which benefit from high degrees of existing screening. The behavioural change is therefore likely to include adopting of alternative routes not simply forgoing of use of the PRoW network. Information boards and signage would be provided to encourage use of the routes. Monitoring is proposed to confirm outcomes and provide additional route promotions if required. Other measures include a new route connecting Church Hanborough and Cassington to enhance the PRoW network. Other potentially adverse effects of the project are also assessed by Chapter 16 [APP-053], including PRoW effects during the construction phase, and it is concluded that none would give rise to significant adverse population health effects, including for vulnerable groups. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out measures to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which sets out measures to promote use of the PRoW network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring of use of PRoWs. The Chapter 16 assessment [APP-053] has carefully considered the context and the relevant public health impacts to support an appropriate mitigation package for the specific issue of PRoW use. More broadly, Chapter 16 recognises that the Project would bring significant renewable energy security benefits, experienced locally as well as nationally, which would have a protective effect on public health (paragraph 16.9.239 [APP-053]).
280, 536, 574, 849	Traffic and transport health effects	Concerns regarding potential health effects associated with increased traffic and transport during construction, including risks to road safety, pedestrian safety, and air quality, particularly from HGV movements during construction and decommissioning.	We acknowledge concerns that Project traffic generation and temporary disruption to some routes has the potential to affect health outcomes. With regards to transport effects, the primary analysis is set out in Volume 1, Chapter 12: Traffic and Transport [APP-049]. Other relevant analyses include Volume 1, Chapter 19: Air Quality [APP-056], and Volume 1, Chapter 13: Noise and Vibration [APP-050]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Health impacts associated with transport modes, access and connections are assessed in Chapter 16 Section 16.9 [APP-053]. The analysis takes into account vulnerable groups, including local road users, pedestrians, cyclists and emergency services. Sensitive establishments are listed at paragraph 16.5.20. These include schools, nursing homes and healthcare facilities. Mitigation measures, including the Outline Construction Traffic Management Plan (within the

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			Code of Construction Practice [APP-232]), would appropriately manage HGV routing, minimise congestion, and protect sensitive receptors along affected routes and surrounding communities. The Chapter 16 assessment [APP-053] concludes that no significant public health impacts, including for health inequalities, are likely to arise in relation to the traffic and transport impacts of the Project.
24, 126, 161, 257, 969	Loss of agriculture, diet and nutrition	Concerns regarding the loss of agricultural land as a result of the Project and the perceived implications for local food production, food security, diet and nutrition. Representations raised issues around diminishing opportunities for healthy food.	We acknowledge concerns regarding the potential for the Project to reduce agricultural land and impact on availability of food. The primary analysis of agricultural land use effects is set out in Volume 1, Chapter 17: Agricultural Land Use and Public Rights of Way [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. The “Diet and nutrition” determinant in section 16.9 of Volume 1: Chapter 16: Human Health of the ES [APP-053] discusses effects of the Project on access to affordable local healthy food which may impact diet and nutrition. The Chapter 16 assessment recognises that there will be a reduction of arable agricultural land commencing during the construction period. During operation, the Project will seek to retain agricultural use, through grazing, within areas of the solar arrays, as discussed in the Outline Landscape and Ecology Management Plan [APP-235]. The affected agricultural land is not identified to play an influential role in local food markets and is therefore not anticipated to significantly change local food price or availability. Food quality, availability and affordability in the area is determined by national and international agricultural land and food markets. Notwithstanding this, in addition to the grazing, the Project includes up to 30ha for food growing community groups to operate of the Site, see Volume 1, Chapter 15: Socio Economics of the ES [APP-052] and the Outline Operational Management Plan [APP-234]. The Chapter 16 assessment [APP-053] concludes that no significant changes are likely to arise in relation to local diet or nutrition as a result of the Project, including for vulnerable groups.
30, 64, 733, 813	Air quality health effects	Concerns regarding the potential for air quality impacts from the Project, including dust and emissions during construction, and the associated effects on health.	We acknowledge concerns regarding the potential air quality health effects resulting from the Project. With regard to air quality effects, the primary analysis is set out in Volume 1, Chapter 19: Air Quality [APP-056]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. The analysis includes emissions from Project vehicles and equipment, as well as dust generated by Project activities. The assessment focuses on the construction and decommissioning phases. Operational air quality effects were scoped out of the assessment as confirmed in the Scoping Report [APP-125] (pdf page 116 of 169). Operational air quality effects (e.g. maintenance vehicle emissions) are not of a scale, even accounting for effects below regulatory air quality standards (non-threshold effects), that could significantly affect population health. Health impacts associated with air quality are assessed in Chapter 16 Section 16.9. The analysis takes into account vulnerable groups, including children and young people, older people, people with existing poor health and people in close proximity to the Project. Sensitive establishments are listed at paragraph 16.5.20. These include schools, nursing homes and healthcare facilities. The Chapter 16 assessment [APP-053] concludes that no significant changes are likely to arise in relation to changes in air quality, including

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			dust, as a result of the Project, including for vulnerable groups. The health assessment has regard to effects even below regulatory air quality standards (non-threshold effects). Air quality mitigation measures are secured through the Outline Code of Construction Practice [APP-232], including the Outline Dust and Traffic Management plans.
30, 64, 128, 137, 161, 217, 388, 589, 655, 667, 855, 869	Noise and vibration health effects	Concerns regarding the potential for noise and vibration from the Project during construction and operation phases to negatively affect health and wellbeing, including impacts on stress and quality of life for nearby residents.	We acknowledge concerns regarding the potential noise and vibration health effects resulting from the Project. With regard to noise effects, the primary analysis is set out in Volume 1, Chapter 13: Noise and Vibration of the ES [APP-050]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Chapter 13: Noise and Vibration [APP-050] confirms that Best Practicable Means (as defined in Section 72 of the Control of Pollution Act 1974 and Section 79 of the Environmental Protection Act 1990) will be implemented during the design, construction, operation, and maintenance of all aspects of the Project to minimise noise levels in all reasonably foreseeable circumstances. Health impacts associated with noise and vibration are assessed in Chapter 16 Section 16.9 [APP-053]. The analysis takes into account vulnerable groups, including local residents and long-term users of nearby properties and community building, public rights of way users, children and young people (including as more vulnerable for disturbances to learning environments), older people, people with limited resources to adapt to Project changes, and those who live in close proximity to construction activities and/or the Project substations. Sensitive establishments are listed at paragraph 16.5.20. These include schools, nursing homes and healthcare facilities. The Chapter 16 assessment [APP-053] concludes that the Project's noise and vibration impacts would not result in significant population health effects, including for the vulnerable group population. This includes impacts related to construction, operation and maintenance and decommissioning. Mitigation measures, including appropriate construction hours and best practice measures in line with the Control of Pollution Act 1974 requirements and British Standard (BS) 5228 'Code of Practice for Noise and Vibration Control on Construction and Open Sites', would be agreed with the local authority prior to construction commencing through a Construction Noise and Vibration Management Plan, as discussed in the Code of Construction Practice [APP-232]. These measures would appropriately manage noise and vibration impacts from construction activities and construction traffic. Noise impacts from operation and maintenance of the substation would be mitigated through Best Practicable Means implemented through the design of the substations, detailed within the Outline Operational Management Plan [APP-234].
34, 242, 280, 366, 454, 488, 554, 603, 574, 733, 758, 822, 855, 933, 974, 978	Vulnerable groups	Concerns raised about potential health and wellbeing impacts of the Project on vulnerable groups, including children, older people, people with disabilities and people with pre-existing conditions	We acknowledge the need to take into account vulnerable groups as part of the assessment of potential health and wellbeing effects of the Project. Volume 1: Chapter 16: Human Health of the ES [APP-053] follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA). The chapter identifies the following factors that may increase vulnerability or sensitivity: young age, old age, lower income, poor health, social disadvantage, and access and geographical factors (Table 16.22 [APP-053]). These vulnerable groups align with the priority areas identified by the Oxfordshire Joint Strategic Needs Assessment (Section

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			16.6), the Oxfordshire Health and Wellbeing Strategy 2024-2030 (Section 16.2), and the Oxfordshire County Council Outcomes Framework 2022-2023 (Section 16.2). Chapter 16 [APP-053] baseline conditions (Section 16.6) highlight existing inequalities and vulnerabilities within the site-specific and local populations. Specific regard is given to vulnerable population groups, including young people, older people, people with disabilities and those with pre-existing conditions. Sensitive establishments, including schools, nursing homes, and healthcare facilities are listed at paragraph 16.5.20. Community health profiles are set out in Appendix 16.3 [APP-221] and have informed the Chapter 16 assessment. The analysis in Chapter 16 section 16.9 [APP-053] takes into account vulnerable groups, including those identified in Table 16.22. As confirmed in the methods section of Chapter 16 (paragraph 16.5.18), for the purposes of the assessment the sensitivity score of the vulnerable group population drives the significance conclusion to ensure that the potential for health inequalities is taken into account.
63, 65, 169, 249, 257, 264, 333, 342, 346, 489, 541, 545, 554, 558, 733, 813, 872, 934, 1077, 1104	EMF risks	Concerns regarding potential health risks from electromagnetic fields (EMF) associated with the Project’s infrastructure, including substation and cables, particularly for nearby residents.	We acknowledge concerns regarding electromagnetic fields (EMF) associated with the Project’s infrastructure, including arrays, cabling, power converter stations, transformers and substations. Volume 1, Chapter 16: Human Health [APP-053] Table 16.23 includes the commitment that the Project adopts the relevant International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines (ICNIRP 1998, 2010) and the Government Voluntary Code of Practice (Department for Energy Security & Net Zero, 2012). Compliance with those guidelines provides appropriate public health protection and is in line with Government policy (Chapter 16 Table 16.4). Further detail is set out in Chapter 16, Section 16.9 and no significant effects to public health would be expected to arise. Power lines and electrical infrastructure are ubiquitous feature of the environment, and the Project would be compliant with the relevant requirements of the Electricity Safety, Quality and Continuity Regulations 2002. These regulations relate to the installation and use of electrical networks and equipment owned or operated by generators and distributors. The ICNIRP guidelines (ICNIRP, 1998, 2010) and Government Voluntary Code of Practice (Department for Energy Security & Net Zero, 2012) are long standing and have a high safety margin. The levels of exposure that they require would not pose a risk to public health. The Project’s detailed design delivers compliance with such health protection standards. For example, buried cables do not produce an electric field at the surface and cables are engineered to be ICNIRP compliant in relation to magnetic fields. The Department of Health and Social Care’s advice on EMF exposures have not changed since 2013. The UK Health Security Agency guidance on reducing exposure to EMF was updated in March 2024 and state that “<i>measures to reduce fields, such as avoiding the routing of power lines near to homes, or not building homes close to power lines, are not needed</i>”. Illustratively as a worst case the National Grid publication, ‘<i>Undergrounding high voltage electricity transmission lines, The technical issues, 2015</i>’, notes in Section 9 (pdf page 18/19) that for a 400 kV buried cable (the largest transmission cables used in the UK) that are 0.9m underground typically have magnetic field strengths directly above the cable at the surface of 24 µT (which is less than a tenth of the public exposure limit and that this

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			drops by almost an order of magnitude within 5m). The Project is primarily 33kv and 275kV cables, with one stretch of 400kV connecting the applicant main substation (275/400 kV) to the NGET substation. The Project's 400kV cable would be buried to at least 0.9m, typically 1.2m. Notwithstanding that the 400kV line would be compliant with the ICNIRP guidelines to ensure that it met health protection standards, the 400kV cable is not in proximity to dwellings or public rights of way. 33kV cables are inherently compliant with ICNIRP guidelines by design¹ and the 275kV and 400kV cables, and associated substations and other electrical equipment, would be designed to be ICNIRP compliant, as is the Project commitment and the policy requirement (EN-5, paragraph 2.9.55). Chapter 6 - Project Description [APP-043] sets out the operational electrical infrastructure speciation (Table 6.3 and the paragraphs following that table). The Applicant would be responsible for monitoring compliance with the guideline limits set out in the ICNIRP guidelines and the UK Government voluntary code of practice. Confirmation of compliance with the ICNIRP guidelines and the UK Government voluntary code of practice would be set out by the Applicant in post consenting detailed engineering calculations. This may include if appropriate one-off confirmatory measurement of in-situ field strengths following the approach set out in the UK Government Voluntary Code of Practice. As there can be community concern around electrical infrastructure, notwithstanding that it would be within health protection standards, Chapter 16 [APP-053] assessed public understanding of risk in relation to operational EMF and concludes the project should not result in any significance adverse impact on public health, including for vulnerable groups. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including continued community consultation and sharing of non-technical information relating to the project (e.g. explaining compliance with public exposure guidelines, actual risks associated with the project), to allow people to express concerns and gain awareness of actual health effects. The commitment includes to sharing a point of contact for community liaison on the project website.
63, 64, 126, 482, 849, 1096	Climate change health effects	Concerns raised regarding potential climate-related health effects associated with the Project, including perceived risks from UV radiation bounce-back from solar panels, changes to local microclimates, increased emissions from construction traffic and associated congestion, and potential for localised heat island effects due to loss of vegetation and land cover change.	We acknowledge concerns regarding potential climate related health effects resulting from the Project. The primary analysis of the overall climate changes effects are set out in Volume 1, Chapter 14: Climate Change of the ES [APP-051], including considerations in relation to Project vehicle emissions. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Chapter 16 [APP-053] section 16.6 includes considering the future baseline associated with climate change and section 16.9 includes assessment in relation to climate change and adaptation. The assessment concludes that the Project's renewable energy provides a positive contribution to reducing

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			the health effects associated with climate change, locally, nationally and internationally. With regard to ultra-violet radiation, although some reflection occurs from solar panels, the primary role of solar panels is absorption not reflection. There is not considered to be the potential for a likely significant population health effect on this issue and as such it has not been scoped into the Environmental Statement. A glint and glare study is included in Appendix 4.4 of the Environmental Statement [APP-128]. That assessment relates to the visible light spectrum but also demonstrates that other reflected naturally occurring solar radiation would not significantly affect dwellings, including due to new and existing screening. With regard to the issue of heat island effects and microclimates, the scientific literature on this issue is sparse and the available evidence indicates that any effect is likely to be relatively small and geographically limited in the contexts relevant to this project (Fthenakis and Yu 2013). The studies that tend to identify solar health island effects tend to be from arid or desert contexts (Barron-Gafford et al 2016), with the greatest temperature variations being at night and within the array areas. Recent studies show solar farms may have a cooling effect (Xu et al., 2024). The role of vegetation, including the Projects planting of trees and hedgerows is likely to contribute to cooling and shade for those passing through array areas. There is not considered to be the potential for a likely significant population health effect on this issue and as such it has not been scoped into the Environmental Statement.
235, 281, 638, 928, 969	Healthcare capacity	Concerns that the Project may place additional strain on local healthcare services.	We acknowledge your concerns regarding the potential impacts of the Project on healthcare capacity. The issue of impacts to health and social care services for all Project phases was considered at the scoping stage, as set out in Scoping Report [APP-125] Table 7.19 (pdf page 118 of 169). The Scoping Opinion [APP-126] section 3.10, ID 3.10.11 agreed with scoping out health and social care effects on the basis that a high proportion of the project workforce is anticipated to be those that are resident in the regional area and therefore no changes to the health and social services are anticipated from in-migrating workers. The conclusions of Volume 1, Chapter 16: Human Health of the Environmental Statement [APP-053] include both beneficial and adverse effects; and whilst one short-term significant adverse effect may arise at the start of the operational phase, this relates to a public health issue of short-term behavioural change in relation to use of public rights of way (see the response under the theme of 'Access to open space, Public Rights of Way, recreation, and physical activity') and not to any acute or sustained pressure on local health or social care services. It remains the case that no significant effects for health and social care services are likely to arise.
271, 711, 295, 711	Security, CCTV, privacy	Concerns raised about the potential impacts of security measures associated with the Project, including the presence of CCTV, on residents' privacy and perceptions of surveillance.	Fourteen CCTV cameras will be provided; two located on each of the six Secondary Project Substations, and two on the Main Project Substation. (Table 6.4 and section 6.4.38 [APP-043]). The CCTV cameras will include infrared capability and emergency lighting, but with no permanent external lighting. The CCTV systems be inward-facing, focused on internal infrastructure, and will not affect residential privacy.

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278, 333, 333, 554, 813, 1026	Toxic chemicals	Concerns raised regarding potential health and environmental risks from toxic chemicals associated with the Project, including the possibility of chemical leaching from solar panels, hazardous substances used in panel production and disposal, chemical release during extreme weather events, and potential impacts on surrounding vegetation and ecosystems.	The solar panels proposed for Botley West are durable, solid-state units with no liquids or hazardous substances that could leak during normal use or extreme weather. The materials used (silicon, EVA film, glass, backing film, aluminium frame) are stable and sealed. The cells are embedded in polymer films (e.g. EVA) and protected by front glass and back glass - this prevents material leakage.
393, 483, 639, 711, 849, 926, 940, 962	High fencing, security and safety	Concerns raised about the visual and physical impacts of high-security fencing, including perceived risks to personal safety, sense of enclosure, community severance, and potential psychological effects linked to an industrialised landscape.	We acknowledge your concerns regarding the potential impacts of the Project on perceptions of personal safety when using Public Rights of Way (PRoW) due to the fencing and landscaping proposals. The issue of Crime and Community Safety were considered at the scoping stage, as set out in Scoping Report [APP-125] Table 7.18 (pdf page 111 of 169) and Table 7.19 (pdf page 115 of 169). That analysis concluded that actual and perceived crime effects were unlikely, including during operation, and were therefore scoped out in line with proportionate assessment. The Scoping Opinion [APP-126] section 3.10, ID 3.10.5 agreed with scoping out Community Safety on the basis that any associated potential risks of Major Accidents or Disasters (section 9.5 of the Scoping Report) would be identified and mitigated. Community personal safety concerns are not considered to fall within the remit of Major Accidents or Disasters, and it continues to be the case that actual or perceived crime risks on the PRoW network are considered unlikely with or without the development. Similarly, Scoping Opinion [APP-126] section ID 3.9.7 confirms for all project phases that significant effects are not likely in relation to crime and safety. This is confirmed in Volume 1 Chapter 15 – Socio-economics [APP-052] Table 15.7 penultimate row. The presence of hedging and fencing is not considered to be a determining factor in significant actual or perceived crime risks. Whilst it is possible that a few people may feel more concerned on a route with hedges and fencing, equally other people may feel more secure, and in either case it is not considered likely that there could be a significant adverse effect on public health as a result. The Outline Landscape and Ecology Management Plan [APP-235] sets out detail on the approach to creating attractive route, including appropriate widths and hedge management. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRoWs is required. This could include measures in relation to public safety if required, although this is not anticipated to be the case.
482, 554, 558, 819, 822, 935, 974, 979	Tornadoes	Concerns about public safety risks posed by the potential for solar panels or associated infrastructure to become dislodged and cause property damage, injury or death during extreme weather events such as tornadoes or high winds, including the danger of flying debris near residential areas.	The Botley West Solar Farm has been designed to account for such risks through compliance with international manufacturing and installation standards. All solar PV modules will be built to IEC TS 63126:2020, IEC 62548, and IEC 61215-1:2021 standards, which specifically address performance under extreme weather conditions such as high winds, hail, and thermal fluctuations (Chapter 14: Climate Change [APP-051], Table 14.6,

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			Page 13; Chapter 6: Project Description [APP-043], Section 6.4.8, Page 15). Mounting structures will consist of galvanized steel and aluminium, driven 1 to 3 meters into the ground using piling or screwing rigs to ensure stability under load. The design accounts for worst-case scenarios by assuming two-leg support at each end of module tables, enhancing structural integrity (Chapter 6 [APP-043], Section 6.4.10, Page 15). No residential areas are located within the boundaries of infrastructure that could pose a risk, and the Project design includes buffer zones and setback requirements as part of embedded mitigation (Chapter 10: Hydrology and Flood Risk [APP-047], Table 10.26, Page 67).
257, 263, 489, 554, 711, 822, 934	Batteries	Concerns regarding the presence of batteries as part of the Project, including the potential health and safety risks associated with lithium-ion batteries, fire or explosion hazards, proximity of battery storage to residential areas, the scale of proposed battery installations and pylons, and uncertainty about the implications of battery-operated solar technology.	Section 6.4.3 of Chapter 6: Project Description [APP 043] confirms that Battery Energy Storage Systems (BESS) are not included as part of the Botley West Solar Farm development. As a result, the project does not present the battery-related fire risks that can be associated with high-voltage energy storage infrastructure. Where energy storage is required, it will be managed off-site at existing grid facilities.
136	Cassington Sports and Social Club	Concern regarding potential loss of income affecting viability of the organisation to maintain and provide the community facilities.	The Landscape Resources Plan Figure 8.5 [APP-081] shows the Project boundary and existing public right of way adjacent to the Cassington Sports and Social Club. Illustrative Masterplan Figure 2.2D [APP-062] shows the Project infrastructure in relation to the Cassington Sports and Social Club, as well as the new proposed path, which would enhance access to the club area and the wider public right of way network. The Landscape, Ecology and Amenities Plan [APP-228] Layer Plan Central Site Area 4 of 4 shows the areas of existing hedging, proposed reinforced hedging and additional tree planting. There is also bunding and a pond, which extend the setback distance from panels. These features, in addition to the existing mature hedging and trees along the boundary with the Cassington Sports and Social Club are likely to greatly limit the potential for views of the solar arrays to an extent that could significantly disincentivise use of the club facilities. In terms of the change in views, of the 55 representative viewpoints and 33 photomontages agreed with the host authorities, the view from the CSSC was not one selected for specific assessment. However, the potential impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including areas of recreation, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-6.3]. Paragraph 8.6.63 <i>et seq.</i> considers the views from outdoor recreational facilities. Figure 17.5 - PRoW and Other Promoted Routes [APP-112] shows the public rights of way in the vicinity of the Cassington Sports and Social Club. Route 152/6/10 passes along the western boundary of the club, with a new proposed path along the north and east sides of the club, providing improved access. ES Appendix 16.4 Human Health PRoW Analysis [APP-222] provides analysis in relation to route 152/6/10, including having regard to the presence of the Cassington recreation ground and play area and the identification of mitigation.

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			The Community Fund is available to support local community initiatives. Cassington Sports and Social Club would be able to make applications to the fund to enhance its community offer.
759	Land and water contamination	Concerns regarding potential contamination of land and water arising from the Project, including risks of soil degradation, water runoff pollution, and leaching of hazardous substances from solar panel materials into the surrounding environment.	The outline Construction Code of Practice (oCoCP) [APP-232 & 233] the outline Operational Management Plan [APP-234] and the outline Decommissioning Plan [APP-236] will all be developed further, and subject to the discharge of requirements associated with the DCO, to identify, manage and avoid risks of pollution to land and water resources during construction, operation and decommissioning. The outline Landscape and Ecology Management Plan [APP-235] also identifies the proposed approach to soil management.
RR-1076-010	Loss of amenity and green space for healthy living	Loss of amenity and green space for healthy living	We acknowledge your concerns regarding the potential impacts of the Project on the amenity value of the Public Rights of Way (PRoW) network and associated effects on health and wellbeing. The primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRoW) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRoW [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The assessment identifies that there would be some short-term adverse effects on population health as a result of the changes in setting of some parts of the PRoW network. However, as planting matures, the effects would reduce. The assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRoW network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRoWs is required.

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RR-870-001	Amenity of the PRow network	Concern that the amenity of the PRow network will be impacted and the creation of corridors will make the footpaths no longer attractive to users of the network for recreational purposes. Concern that the loss of amenity will have a negative impact on health and wellbeing.	We acknowledge your concerns regarding the potential impacts of the Project on the amenity value of the Public Rights of Way (PRow) network and associated effects on health and wellbeing. The primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRow) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The assessment identifies that there would be some short-term adverse effects on population health as a result of the changes in setting of some parts of the PRow network. However, as planting matures, the effects would reduce. The assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRow network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRow is required.
RR-0103-001	Amenity of the PRow network	Concern that the amenity of the PRow network will be impacted and the creation of corridors will make the footpaths no longer attractive to users of the network for recreational purposes. Concern that the loss of amenity will have a negative impact on health and wellbeing.	We acknowledge your concerns regarding the potential impacts of the Project on the amenity value of the Public Rights of Way (PRow) network and associated effects on health and wellbeing. The primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRow) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for

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			human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The assessment identifies that there would be some short-term adverse effects on population health as a result of the changes in setting of some parts of the PRow network. However, as planting matures, the effects would reduce. The assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRow network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRows is required.
RR-1007-004 130	Amenity of the PRow network	Concern that the amenity of the PRows network will be impacted and the creation of corridors will make the footpaths no longer attractive to users of the network for recreational purposes. Concern that the loss of amenity will have a negative impact on health and wellbeing.	We acknowledge your concerns regarding the potential impacts of the Project on the amenity value of the Public Rights of Way (PRow) network and associated effects on health and wellbeing. The primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRow) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The assessment identifies that there would be some short-term adverse effects on population health as a result of the changes in setting of some parts of the PRow network. However, as planting matures, the effects would reduce. The assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M.

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			Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053] . Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235] , which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232] , which also sets out measures to promote use of the PRoW network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRoWs is required.
RR-870-003 128	Loss of countryside views affecting mental and physical health benefits of walking	Concerns that the Project will completely obstruct valued countryside views, thereby diminishing the mental and physical health benefits of walking in the area. The representation challenges the conclusion of adverse (medium) change, asserting that hedgerow planting will obscure scenic views and perpetuate adverse impacts for the duration of the Project.	We acknowledge your concerns regarding the potential impacts of the Project on physical health, mental health, access to open space and recreation, and countryside views. The primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRoW) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRoW [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The existing public right of way network context includes routes that have high hedging on both sides, as well as stretches with more open views. For the health assessment the relevant outcomes relate to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. This means that some stretches would have additional and higher hedges that reduce wider landscape views. The balance of providing appropriate screening has been carefully considered alongside other feature to maintain route amenity as set out in the Outline Landscape and Ecology Management Plan [APP-235]. The Chapter 16 assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. Whilst the Ramblers Associate may place weight on open views, from the public health perspective access to open views across the entire route is not required to avoid significant adverse public health impacts. Indeed, the approach of creating attractive greenways between communities that screen views for the sections where the route passes through the arrays is considered appropriate mitigation in maintaining route use. The PRoW network experience will be of a variety of route characters, some greenways with new and higher hedging, other existing open areas of the routes. The health assessments analysis and conclusions are considered robust and reflect public health outcomes.

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			Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053] . Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235] , which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232] , which also sets out measures to promote use of the PRow network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRow is required.
RR-0102-012	Perceived personal safety concerns from high fencing along walking routes	Concern that the high and continuous fencing will create enclosed corridors that may feel unsafe for users.	We acknowledge your concerns regarding the potential impacts of the Project on perceptions of personal safety when using Public Rights of Way (PRow) due to the fencing and landscaping proposals. The issue of Crime and Community Safety were considered at the scoping stage, as set out in Scoping Report [APP-125] Table 7.18 (pdf page 111 of 169) and Table 7.19 (pdf page 115 of 169). That analysis concluded that actual and perceived crime effects were unlikely, including during operation, and were therefore scoped out in line with proportionate assessment. The Scoping Opinion [APP-126] section 3.10, ID 3.10.5 agreed with scoping out Community Safety on the basis that any associated potential risks of Major Accidents or Disasters (section 9.5 of the Scoping Report) would be identified and mitigated. Community personal safety concerns are not considered to fall within the remit of Major Accidents or Disasters, and it continues to be the case that actual or perceived crime risks on the PRow network are considered unlikely with or without the development. Similarly, Scoping Opinion [APP-126] section ID 3.9.7 confirms for all project phases that significant effects are not likely in relation to crime and safety. This is confirmed in Volume 1 Chapter 15 – Socio-economics [APP-052] Table 15.7 penultimate row. The presence of hedging and fencing is not considered to be a determining factor in significant actual or perceived crime risks. Whilst it is possible that a few people may feel more concerned on a route with hedges and fencing, equally other people may feel more secure, and in either case it is not considered likely that there could be a significant adverse effect on public health as a result. The Outline Landscape and Ecology Management Plan [APP-235] sets out detail on the approach to creating attractive route, including appropriate widths and hedge management. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRow is required. This could include measures in relation to public safety if required, although this is not anticipated to be the case.
RR-0102-013	Amenity of the PRow network	Concern that the amenity of the PRow network will be impacted and the creation of corridors will make the footpaths no longer attractive to users of the network for recreational purposes. Concern that the loss of amenity will have a negative impact on health and wellbeing.	We acknowledge your concerns regarding the potential impacts of the Project on the amenity value of the Public Rights of Way (PRow) network and associated effects on health and wellbeing. The primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRow) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume

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			1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The assessment identifies that there would be some short-term adverse effects on population health as a result of the changes in setting of some parts of the PRoW network. However, as planting matures, the effects would reduce. The assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRoW network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRoWs is required.
RR-0205-13	General physical and mental health impacts PRoW and recreation impacts EMF concerns Construction traffic and HGVs Proximity to residential areas and community facilities	Concerns raised regarding a wide range of physical and mental health impacts already being experienced by the local community as a result of the planning process, with an expectation that impacts will worsen during construction. Stress and despondency due to limited local resources. Health risks from HGV routes near schools, nurseries and public buildings. Loss of amenity and health benefits from recreational sites like Farmoor Reservoir. Lack of confidence in ICNIRP compliance claims due to inaccuracies in mapping of premises near HV cables.	We acknowledge your concerns regarding the potential impacts of the Project on physical and mental health, transport modes, access and connections health effects, access to recreational facilities, cumulative effects, and EMF risks. With regard to community concern and mental health, the Environmental Statement assessments deliver the statutory requirement to set out the likely significant effects of the Project. The availability of such information, including on human health in the non-technical summary [APP-037], supports the community understanding of the likely project impacts and outcomes. Availability of such information is an important factor in supporting population mental health, including in relation to concerns that may arise during the application determination process. Further to this, public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. These include continued community consultation and sharing of non-technical information relating to the project to allow people to express concerns and gain awareness of actual health effects. This measure is supportive of community mental health and wellbeing as the project progresses. With regards to transport effects, the primary analysis is set out in Volume 1, Chapter 12: Traffic and Transport [APP-049]. Other relevant analyses include Volume 1, Chapter 19: Air Quality [APP-056], and Volume 1, Chapter 13: Noise and Vibration [APP-050]. Volume 1, Chapter 16: Human

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		Perceived insufficient community benefit relative to scale of adverse health and wellbeing impacts from proximity to large-scale solar infrastructure.	Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Health impacts associated with transport modes, access and connections are assessed in Chapter 16 Section 16.9. The analysis takes into account vulnerable groups, including local road users, pedestrians, cyclists and emergency services. Sensitive establishments are listed at paragraph 16.5.20. These include schools, nursing homes and healthcare facilities. Mitigation measures, including the Outline Construction Traffic Management Plan (within the Code of Construction Practice [APP-232]), would appropriately manage HGV routing, minimise congestion, and protect sensitive receptors along affected routes, including at Farmoor reservoir and surrounding communities. With regard to recreation, the primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRoW) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRoW [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The assessment identifies that there would be some short-term adverse effects on population health as a result of the changes in setting of some parts of the PRoW network. However, as planting matures, the effects would reduce. The assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. Solar arrays are common in many communities and are often installed across residential roofs. Proximity to solar technology in itself does not give rise to significant public health effects. With regards to EMF, the project commitment to adopt the ICNIRP guidelines and Government Voluntary Code of Practice (Chapter 16 Table 16.23) provides appropriate public health protection and is in line with Government policy (Chapter 16 Table 16.4). Further detail is set out in Chapter 16, Section 16.9 and no significant effects to public health would be expected to arise. Power lines and electrical infrastructure are ubiquitous feature of the environment. As there can be community concern around electrical infrastructure, notwithstanding that it would be within health protection standards, Chapter 16 [APP-053] assessed public understanding of risk in relation to operational EMF and concludes the project should not result in any significance adverse impact on public health, including for vulnerable groups.

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RR-0784-8 130	Project proximity to habitation and PRow impacts on wellbeing	Concern that the proximity of the Project to residential areas – 11,500 properties within 1.5 km – is unprecedented globally, and that the loss of many PRowWs will cause undue stress on the wellbeing of nearby communities who use the designated fields.	We acknowledge your concerns regarding the potential impacts of the Project on mental health, open space access, and community wellbeing due to changes to the Public Rights of Way (PRow) network. Solar arrays are common in many communities and are often installed across residential roofs. Proximity to solar technology in itself does not give rise to significant public health effects. With regards to EMF, the project commitment to adopt the ICNIRP guidelines and Government Voluntary Code of Practice (Chapter 16 Table 16.23) provides appropriate public health protection and is in line with Government policy (Chapter 16 Table 16.4). Further detail is set out in Chapter 16, Section 16.9 and no significant effects to public health would be expected to arise. Power lines and electrical infrastructure are ubiquitous feature of the environment. As there can be community concern around electrical infrastructure, notwithstanding that it would be within health protection standards, Chapter 16 [APP-053] assessed public understanding of risk in relation to operational EMF and concludes the project should not result in any significance adverse impact on public health, including for vulnerable groups. With regard to recreation, the primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRow) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The assessment identifies that there would be some short-term adverse effects on population health as a result of the changes in setting of some parts of the PRow network. However, as planting matures, the effects would reduce. The assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRow network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRowWs is required.

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			As set out in Chapter 16 section 16.9 the PRow network is maintained during the project with suitable pedestrian access for diversions of any temporary route closures and appropriate wayfinding information for temporary diversions being provided. New permitted paths are introduced, and parts of the PRow network are upgraded.
RR-1086-23 Vale of White Horse District Council	PRow impacts, mitigation measures and changes in landscape character	Concern that the assessment of PRow impacts focuses on inter-community connectivity rather than recreational use or changes in landscape character and views. Concerns that visual impacts and mitigation measures, primarily hedgerow planting, may alter the nature of PRowS by creating narrow vegetated corridors, potentially affecting user experience. Concerns also raised about clarity and completeness of information on PRow lengths affected and visual impacts beyond the red line boundary.	We acknowledge your concerns regarding the potential impacts of the Project on the character of the Public Rights of Way (PRow) network, recreational amenity, and landscape setting, and how these influence human health and wellbeing. The primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRow) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The existing public right of way network context includes routes that have high hedging on both sides, as well as stretches with more open views. For the health assessment the relevant outcomes relate to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. This means that some stretches would have additional and higher hedges that reduce wider landscape views. The balance of providing appropriate screening has been carefully considered alongside other feature to maintain route amenity as set out in the Outline Landscape and Ecology Management Plan [APP-235]. The Chapter 16 assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. The Chapter 16 assessment has been transparent in articulating potential change and its potential to affect behavioural change at a population level. The character of parts of the PRow network would change, however the health assessment explains where these changes would be and what approximate durations and alternatives are available for PRow users. The assessment appropriately focuses on the key routes connecting communities and areas where the views are most affected by passing through the arrays. The impact on public health is not simply a function of the length of routes, percentage of routes affected or of how many routes have occasional views of the arrays. The assessment has carefully considered the context and the relevant public health impacts to support the development of a mitigation package to avoid significant adverse effects, for

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			a project that brings significant wider societal benefits from its renewable energy generation, including for public health. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRow network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRow is required.
RR-0164-025 Cherwell District Council	Reduced access to PRow and associated health impacts	Acknowledgement of the ES assessment on reduced access to Public Rights of Way and the associated health impacts. No further comment provided by the Council's Environmental Protection Team.	We note that Cherwell District Council's Environmental Protection team have no comments to make regarding the Human Health chapter of the Environmental Statement (ES). With regard to the observation of reduced access to Public Rights of Way (PRow) the primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRow) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. The Chapter 16 assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. As set out in Chapter 16 section 16.9 the PRow network is maintained during the project with suitable pedestrian access for diversions of any temporary route closures and appropriate wayfinding information for temporary diversions being provided. New permitted paths are introduced, and parts of the PRow network are upgraded. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRow network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRow is required.

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RR-0793-055 Oxfordshire County Council	Scope and coverage of health assessment and impact on access to physical activity opportunities	8.1: The use of a dedicated human health chapter in place of a standalone HIA is acceptable if content is sufficiently comprehensive. 8.2: Support for inclusion of national, regional, and local policy context, including the JSNA and Director of Public Health report. 8.3: The determinants included are appropriate, though a typo is noted in the list on page 22. 8.4: Question raised about the exclusion of Launton and Otmoor ward, which includes areas within 1 km of the site. 8.5: Acknowledgement of method used to identify vulnerable receptors, recognition of schools, care homes, and healthcare facilities as important identifications for vulnerable groups. 8.6: Notes that obesity and physical inactivity are elevated locally, reinforcing the need to protect and promote access to open space, PRow, and recreational areas. 8.7: Supports the transport mitigation measures proposed in the transport section (section 3) of their response.	(8.1) We acknowledge Oxfordshire County Council's (OCC) agreement that Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] is an acceptable Health Impact Assessment. (8.2) We acknowledge the OCC positive statement on the policy context set out in Chapter 16 [APP-053], including on the inclusion of the Oxfordshire Joint Strategic Needs Assessment and the Director of Public Health's annual report on climate change. (8.3) We acknowledge the OCC agreement on the scope of determinants of health set out in Chapter 16 [APP-053]. We note the reference to a minor typographical error in the bullet point list on page [22] (which should refer to 'public understanding of (EMF) risks) and confirm this erratum does not affect the assessment conclusions. (8.4) We note the OCC query as to whether Launton and Otmoor ward should be included in the Human Health study area. Appendix 16.1 Human Health Consultation and Engagement notes that in meetings with OCC public health team in April 2024 the study area was agreed in principle. Notwithstanding this, it is considered that the inclusion of Launton and Otmoor ward would not change the conclusion as to the likely significant population health effects of the project. As set out in Chapter 16 [APP-053] paragraph 16.4.8, <i>"the health chapter uses study areas to broadly define representative population groups, including in relation to sensitivity, rather than to set boundaries on the extent of potential effects. The human health study areas represent the locations that would drive any likely significant population health effect, i.e. where the great majority of the impact is anticipated to occur. Any effects beyond these study areas would not change the conclusions reached in relation to the likely significant population health effects of the Project."</i> The Project's infrastructure (solar arrays and associated works) is not located within Launton and Otmoor ward, and the majority of residents in Peridswell Farm and Shipton-on-Cherwell lie beyond 1 km of the main construction areas. Consequently, in line with proportionate assessment and based on the anticipated spatial extent of health determinants (such as air quality, noise, and access to recreation), it was not considered necessary to include Launton and Otmoor ward in the site-specific population Human Health study area. Launton and Otmoor does however form part of the wider local population Human Health study area (as part of Cherwell District area). (8.5) We note OCC's acknowledgement of the methodology for demining the vulnerability of sensitive receptors and agree , that schools, care homes and other healthcare facilities identified as facilities associated with vulnerable groups are crucial for the assessment. These are set out at paragraph 16.5.20 of Chapter 16 [APP-053]. (8.6) It is agreed that the public health baseline supports the position that there should be appropriate mitigation in relation to physical activity and active promotion of recreation areas and PRow. The Chapter 16 assessment discusses, as early meetings with OCC public health team proposed, how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. Further public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation

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			planting is also described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRoW network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRoWs is required. A key public health enhancement developed through the health impact assessment has been the provision of a new open and covered space in the solar farm for use by school field trips. Further detail is set out in the Outline Operational Management Plan [APP-234] and Figure 16.2 - Illustrative 3D Views of Educational Facility [APP-107]. (8.7) Noted. It is anticipated that there will be further discussion on these measures in collaboration with other ES topic areas.
RR-0098-023	PRoW corridor effects and perceived personal safety	Concern that the creation of fenced and hedged corridors along PRoW may reduce perceived personal safety, deter use, or diminish user enjoyment. Suggests changes to fencing height and hedgerow design to reduce the 'corridor' effect.	We acknowledge the concerns regarding the potential impacts of the Project on perceptions of personal safety and enjoyment of Public Rights of Way (PRoW) arising from the fencing and hedgerow mitigation design. The primary analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRoW) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRoW [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Chapter 16: Human Health follows relevant guidance, including the Institute of Environmental Management and Assessment (IEMA) guidelines for human health in Environmental Impact Assessment (EIA), and consultation has been undertaken with national and local public health authorities. Chapter 16 section 16.9 (Open space, leisure and play) assesses population health outcomes associated with changes in open space and recreation. The existing public right of way network context includes routes that have high hedging on both sides, as well as stretches with more open views. For the health assessment the relevant outcomes relate to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. This means that some stretches would have additional and higher hedges that reduce wider landscape views. The balance of providing appropriate screening has been carefully considered alongside other feature to maintain route amenity as set out in the Outline Landscape and Ecology Management Plan [APP-235]. The Chapter 16 assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. The approach of creating attractive greenways between communities that screen views for the sections where the route passes through the arrays is

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			considered appropriate mitigation in maintaining route use. The PRoW network experience will be of a variety of route characters, some greenways with new and higher hedging, other existing open areas of the routes. The health assessments analysis and conclusions are considered robust and reflect public health outcomes. The issue of Crime and Community Safety were considered at the scoping stage, as set out in Scoping Report [APP-125] Table 7.18 (pdf page 111 of 169) and Table 7.19 (pdf page 115 of 169). That analysis concluded that actual and perceived crime effects were unlikely, including during operation, and were therefore scoped out in line with proportionate assessment. The Scoping Opinion [APP126] section 3.10, ID 3.10.5 agreed with scoping out Community Safety on the basis that any associated potential risks of Major Accidents or Disasters (section 9.5 of the Scoping Report) would be identified and mitigated. Community personal safety concerns are not considered to fall within the remit of Major Accidents or Disasters, and it continues to be the case that actual or perceived crime risks on the PRoW network are considered unlikely with or without the development. Similarly, Scoping Opinion [APP126] section ID 3.9.7 confirms for all project phases that significant effects are not likely in relation to crime and safety. This is confirmed in Volume 1 Chapter 15 – Socio-economics [APP-052] Table 15.7 penultimate row. The presence of hedging and fencing is not considered to be a determining factor in significant actual or perceived crime risks. Whilst it is possible that a few people may feel more concerned on a route with hedges and fencing, equally other people may feel more secure, and in either case it is not considered likely that there could be a significant adverse effect on public health as a result. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRoW network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRoWs is required. This could include measures in relation to public safety if required, although this is not anticipated to be the case.
RR-0792-001	Social inequality and community disadvantage	Concern that the Project may contribute to disadvantage, deprivation, and distress in nearby communities if associated risks are not clearly addressed through the solar farm plans and approval conditions.	We acknowledge the concerns raised regarding the potential for the Project to contribute to disadvantage, deprivation, or distress among nearby communities. The impact of the Project on human health, including mental wellbeing, social cohesion, and deprivation-related factors, are assessed in Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053]. Baseline conditions (Section 16.6) identify existing inequalities and vulnerabilities within the local population, using data from the Index of Multiple Deprivation (IMD) and Joint Strategic Needs Assessments. The assessment acknowledges that large infrastructure projects can, if not appropriately managed, contribute to feelings of distress, loss of community cohesion, or disadvantage. However, the Human Health assessment finds

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			that the Project is not anticipated to create or exacerbate deprivation as there are no significant severances of connectivity, employment opportunities, or community facilities. Moreover, access to the countryside and PRoW network, important for wellbeing and physical activity, will be maintained throughout the construction, operation and decommissioning phases. Where adverse effects do arise in relation to community use of the public right of way network in the early years of the operational solar arrays, such effects are expected to be short-term and reduce over time as planting matures. The Human Health assessment identifies several beneficial effects that will support community health and wellbeing over time (see Section 16.9): • The long-term enhancement of specific PRoW routes into greenways expected to promote safer, more connected active travel and recreation opportunities, supporting improved physical and mental; • The provision of new outdoor educational areas and growing spaces offering opportunities for community engagement, environmental education, and access to fresh produce, further enhancing wellbeing; • Apprenticeship, training and job opportunities, particularly targeting young adults not in education, employment or training, are predicted to result in moderate beneficial effects on health, which are significant in EIA terms; and • The Project's contribution to renewable energy security is assessed to have a moderate beneficial effect for public health, which is significant in EIA terms. The Human Health assessment applies a high sensitivity assumption to potentially vulnerable groups, including those experiencing socio economic disadvantage. The Project also incorporates a Community Benefit Fund, which can provide opportunities for local investment in wellbeing initiatives, although such measures are outside the formal EIA process. The Project is assessed as not likely to contribute to new or worsening deprivation or distress, and instead will provide wider community health benefits over time.
17. Hydrology and Flood risk			
4, 15, 16, 18, 26, 30, 34, 39, 54, 58, 63, 64, 65, 67, 76, 89, 100, 105, 115, 117, 126, 136, 138, 139, 143, 145, 153, 161, 190, 194, 198, 203, 204, 207, 208, 215, 217, 227, 235, 237, 242, 244, 245, 250, 251, 252, 253, 254, 255, 256, 262, 263, 267, 271, 272, 275, 280, 281, 288, 292, 294, 295, 297, 298, 299, 301, 303, 313, 317, 324, 327, 330, 333, 338, 340, 343, 346, 352, 360, 363, 366, 368, 383, 386, 388, 394, 417, 426, 428, 431, 442, 443, 446, 448, 464, 467, 474, 475, 477, 478, 480, 482, 489, 491, 492, 497, 502, 504, 505, 510, 512, 522, 525, 533, 535, 536, 538, 542, 551, 552, 553, 560, 563, 564, 567, 571, 574, 578, 579, 580, 581, 585, 589, 610, 611, 616, 627, 632, 633,	Increased Flood Risk	General concerns regarding the increase of flood risk	Solar panels and ancillary infrastructure (including PCS units, temporary compounds and Transformers (Secondary Substations) have been sequentially steered to areas of low risk of flooding (including Flood Zone 1). An FRA has also been prepared in line with national and local planning policy which discussed the existing flood risk and in the context of the development; ES Volume 3 Appendix 10.1: Flood Risk Assessment (APP-166). This includes consideration of climate change in the sequential design of the solar farm and the conceptual surface water drainage strategy. It demonstrates that the development will not increase flood risk and meets the requirement of the NPPF and NPS EN-1. Solar panels and ancillary infrastructure (including PCS units, temporary compounds and Transformers (Secondary Substations) have been sequentially steered to areas of low risk of flooding (including Flood Zone 1). Chapter 10 is supported by the conceptual drainage strategy [APP-167] which sets out that a key aspect of the Sustainable Drainage Systems (SuDS) Strategy is "<i>to assess the potential impact of the Project on surface</i>

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637, 638, 639, 641, 648, 649, 651, 654, 658, 660, 661, 665, 671, 677, 683, 685, 702, 718, 719, 729, 730, 732, 736, 747, 748, 750, 754, 755, 758, 775, 780, 782, 786, 797, 798, 801, 809, 810, 812, 814, 817, 819, 826, 829, 832, 833, 837, 838, 840, 841, 845, 846, 852, 855, 858, 860, 862, 868, 872, 887, 888, 894, 897, 900, 901, 904, 906, 908, 910, 911, 912, 913, 917, 919, 924, 926, 931, 934, 935, 938, 940, 941, 948, 949, 950, 954, 962, 963, 969, 970, 973, 976, 978, 979, 993, 995, 998, 1001, 1003, 1007, 1009, 1010, 1023, 1026, 1029, 1039, 1040, 1041, 1044, 1047, 1060, 1063, 1077, 1087, 1088, 1092, 1096, 1111			<i>water runoff and to demonstrate the feasibility of appropriate design, such that the Project would not increase flood risk elsewhere'</i>. This is secured under Requirement 9 of Schedule 2 of the draft DCO [AS-009] which provides that no part of the authorised development may commence until written details of the surface water drainage works and (if any) foul water drainage system (including means of pollution control) for that part have been submitted to and approved by the relevant planning Authority. Those written details must be substantially in accordance with the conceptual drainage strategy.
6, 15, 18, 26, 56, 58, 64, 65, 67, 73, 87, 89, 100, 105, 115, 117, 120, 124, 126, 136, 138, 139, 153, 161, 184, 190, 198, 204, 207, 208, 217, 218, 227, 231, 235, 240, 242, 243, 244, 251, 252, 254, 255, 256, 262, 267, 271, 272, 275, 279, 288, 292, 297, 298, 299, 301, 313, 317, 324, 327, 333, 338, 340, 343, 352, 360, 363, 366, 383, 386, 394, 430, 442, 465, 466, 467, 474, 475, 478, 479, 482, 491, 497, 499, 505, 509, 510, 512, 522, 536, 542, 551, 552, 553, 554, 558, 569, 574, 579, 586, 589, 595, 610, 616, 627, 633, 637, 639, 641, 648, 649, 651, 652, 654, 655, 677, 702, 714, 719, 727, 730, 732, 747, 748, 780, 782, 814, 819, 822, 832, 837, 838, 852, 855, 860, 887, 888, 894, 904, 908, 910, 911, 912, 913, 917, 919, 926, 931, 935, 938, 949, 962, 969, 970, 973, 979, 1003, 1010, 1023, 1029, 1041, 1044, 1056, 1060, 1088, 1111	Surface Water Runoff	Specific concerns about the impact of the solar panels to surface water runoff, sloping ground and drip lines.	The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. A comprehensive literature review of how solar farms effect runoff and mitigation measures used during the design are outlined in the Conceptual Drainage Strategy for the site within ES Volume 3 Appendix 10.2: Conceptual Drainage Strategy (APP-167). Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use. The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module. A second environmental benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project. Whilst we note there is pre-existing flooding, the proposed design of the site is to ensure no significant increase in flood risk on or off-site. As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. This is secured in the Outline Layout and Design Principles [PDB-012] and Requirement 5 (Detailed design approval). Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at detailed design stage to ensure that the ground does not become bare due to the lack of maintenance and therefore the peak runoff discharge does not increase over time. The sloping ground in this case will improve solar exposure. The Surface Water Drainage Strategy for the Project also details how runoff from proposed new hardstanding areas will be managed throughout the Project. This is set out in ES Volume 3 Appendix 10.2: Conceptual Drainage Strategy (APP-167).

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			The FRA concludes that as a result of the solar Project there is no increase flood risk on-site and off-site in line with the NPPF and NPS (APP-166).
34, 117, 139, 198, 204, 208, 243, 252, 255, 263, 288, 292, 313, 350, 360, 383, 386, 388, 394, 446, 466, 475, 477, 478, 482, 497, 499, 522, 567, 574, 589, 610, 633, 637, 639, 641, 654, 655, 677, 732, 747, 782, 810, 814, 819, 822, 832, 855, 887, 908, 912, 913, 917, 919, 938, 949, 998, 1003, 1009, 1010, 1026	Flood Risk During Construction	Specific concerns about the impact of the Project on flooding during construction in particular soil compaction.	The development will not commence construction until a Code of Construction Practice Construction Environmental Management Plan and a Construction Surface Water Management Plan has been approved by the LPA in consultation with the LLFA in order to evidence adequate provision both in terms of runoff quantity (flow rates and volumes) as well as quality (pollution mitigation). Mitigation measures for soil management will also be included in these documents and implemented (e.g. where construction has resulted in soil compaction, the areas between panel rows would be tilled/scarified to an appropriate depth and then re-seeded with an appropriate vegetation cover).
26, 218, 254, 271, 278, 313, 429, 465, 474, 478, 522, 558, 586, 814, 896, 1077	Water Quality	General concerns about the impact of the Project on water quality during both construction and operation.	The impact of solar panels on water quality including any required mitigation is set out in the ES Volume 1: Chapter 10 Hydrology and Flood Risk (APP-047). An outline Operational Management Plan (OMP) has been provided as part of application for development consent (APP-234) and includes a commitment for a Pollution Prevention Plans and Maintenance schedule and actions. Detailed OMP's will be developed in line substantially in accordance with the Outline OMP and agreed with relevant stakeholders. This is secured in Requirement 12 (Operational Management Plan) of the draft DCO [AS-009] Detailed OMP's to be secured as DCO requirement and will include Pollution Prevention Plans and Maintenance schedule and actions. To demonstrate that surface water arising from the development during its operational phase will be appropriately treated prior to discharge, the Simple Index Approach, as outlined within the SuDS Manual (CIRIA C753) has been followed. This is discussed in the in the Conceptual Drainage Strategy for the site within ES Volume 3 Appendix 10.2: Conceptual Drainage Strategy (APP-167). Pollution prevention and mitigation measures for construction will be set out in the Construction Surface Water Management Plan at detailed design stage. This document will include pollution monitoring and controls to ensure compliance of the works with the pollution prevention requirements. Water quality is a legal requirement in a Development Consent Order (DCO), this includes impacts on surface water, groundwater, watercourses and protected areas.
18, 58, 67, 73, 87, 89, 100, 115, 124, 136, 204, 208, 217, 240, 272, 275, 279, 288, 313, 333, 340, 352, 386, 399, 428, 430, 467, 474, 475, 478, 482, 505, 522, 563, 579, 581, 595, 610, 627, 641, 649, 719, 730, 732, 747, 748, 755, 780, 817, 852, 855, 904, 906, 912, 913, 935, 949, 962, 979, 1023	Cassington Vulnerability	Specific concerns regarding the impact on the Project on Cassington flooding vulnerability.	Cassington and the local area has a pre-existing history of flooding. Flows are directed by topography which slopes south towards Cassington. Surface water modelling has been undertaken for the catchment area upstream and including Cassington. The results of which are detailed in Appendix 10.5: Surface Water Modelling Report (APP-172). Potential natural flood management options have been considered as part of this study and a wide range of options can be incorporated upstream of the village to reduce the flow and provide attenuation of flood water. The proposed mitigation measures will be tested at detailed design stage. It is important to note that the requirement for reducing flow downstream of the proposed development is not a must. As such, any options provided is anticipated to provide a betterment to the existing downstream catchment area, as opposed to being inherent mitigation built in as part of the Project.

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190, 198, 215, 271, 292, 338, 366, 383, 394, 477, 478, 482, 497, 522, 558, 563, 567, 595, 637, 655, 719, 732, 747, 819, 822, 832, 887, 896, 904, 912, 963, 1003, 1026, 1029, 1092	Existing Drainage	Specific concerns, regarding how the Project will impact existing drainage infrastructure.	The impact of solar panels is set out in ES Volume 1: Chapter 10 Hydrology and Flood Risk (APP-047). It is stated that pre-commencement surveys will be undertaken prior to construction on site to identify local drainage assets and infrastructure. A detailed CoCP is to be provided as part of application for development consent in line substantially in accordance with the Outline CoCP (APP-234) (secured under Requirement 11 of the draft DCO [AS-009]) and will be agreed with relevant stakeholders. The CoCP will detail requirement of pre-commencement surveys and best practice construction techniques to prevent damage to water supply and wastewater drainage infrastructure.
253, 536, 904, 970	Local flood policy	Concerns about the FRA not taking into account of Policy RNE2 of the Cumnor Neighbourhood Local Plan.	ES Volume 1: Chapter 10 Hydrology and Flood Risk (APP-047) and associated Flood Risk Assessment (APP-166) and Conceptual Drainage Strategy (APP-167) have been prepared line with the NPPF, NPS and local policies as well as RNE2.
254	Local and Environmental Damage	The risk of flooding, debris from storms and fire hazards, particularly with lithium batteries.	Section 6.4.3 of Chapter 6: Project Description [APP-043] confirms that Battery Energy Storage Systems (BESS) are not included as part of the Botley West Solar Farm development. As a result, the project does not present the battery-related fire risks typically associated with high-voltage energy storage infrastructure. Where energy storage is required, it will be managed off-site at existing grid facilities, such as the EDF 50MW BESS at Cowley substation, beyond the project boundary. This design approach materially reduces the overall fire risk profile of the development.
313	Treatment of the floodplain and access tracks	Additional information on floodplain restoration and run-off from access tracks	Access tracks are proposed to remain permeable as set out in the Conceptual Drainage Strategy for the site within the ES Volume 3 Appendix 10.2: Conceptual Drainage Strategy (APP-167). It is proposed that the internal access tracks will comprise of gravel and be fully permeable with no tarmac or other hardstanding type surface. Geotextile membrane layers will help secure the aggregate to prevent it sinking into the soil and this will help prevent soil compaction. The majority of access tracks will follow existing farm tracks however certain new purpose-built permeable access track are proposed.
340	Impact of Construction of solar panels and mitigation against water damage	Specific concerns on access track and how solar panels will be adequately protected against flooding / water damage	Access tracks are proposed to remain permeable as set out in the Conceptual Drainage Strategy for the site within the ES Volume 3 Appendix 10.2: Conceptual Drainage Strategy (APP-167). It is proposed that the internal access tracks will comprise of gravel and be fully permeable with no tarmac or other hardstanding type surface. Geotextile membrane layers will help secure the aggregate to prevent it sinking into the soil and this will help prevent soil compaction. The majority of access tracks will follow existing farm tracks however certain new purpose-built permeable access track are proposed. Details on how solar panels will be protected against flood / water damage are set out in the ES Volume 1: Chapter 10 Hydrology and Flood Risk (APP-047). The solar panels are proposed to be placed outside of the 1 in 1000-year surface water flood extents. Any other solar panels within surface water risk areas by nature of the design will be raised above the ground on steel frames allowing water to flow beneath. Any Solar PV modules are waterproof and will be raised 800mm above ground levels at the lower edge. Solar PV panels are limited to areas at risk of surface water flooding where depths do not exceed 300mm.

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429	Water use and pollution	Specific concerns on amount of water required for cleaning solar panels which could strain water resources	The Applicant confirms that the photovoltaic panels will be naturally cleaned by the rain and no separate water supply is required for cleaning.
465	Hydrology concerns	General hydrology concerns with focus on watercourse easement	As set out in the ES Volume 1: Chapter 10 Hydrology and Flood Risk (APP-047), an appropriate easement is proposed for all watercourses on site. No development is proposed within this easement.
882	Development within floodplain	Specific concern on placing development within floodplain	Solar panels have been sequentially steered to areas of low risk of flooding (including Flood Zone 1). No development is proposed within the floodplain, including the Evenlode meadows. This is detailed within the FRA which has been prepared in line with national and local planning policy; ES Volume 3 Appendix 10.1: Flood Risk Assessment (APP-166). This includes consideration of climate change in the sequential design of the solar farm and the conceptual surface water drainage strategy. It demonstrates that the development will not increase flood risk. As part of this flood risk was considered in the selection of a suitable site along with wider environmental constraints.
884		The Botley West Acceptance Stage Glossary (2) does not include an exploration of uncertainty, risk, and optimism bias, which is sound practice in option appraisal (Green Book pp. 47-49). Kay and King (3) explain that data from the past can be an unreliable guide to our radically uncertain future (as with the flawed models that caused the global financial crisis). Hence the paradox: a green energy strategy that aims to tackle the future threat of climate change ought to recognise that climate change is a major cause of radical uncertainty. Specifically, to Botley West, the recent floods in the affected area mean that, Volume 1, ES Chapter 10 - Hydrology and Flood Risk (4) is now out of date. And a consequence of climate change has been devastation of a solar farm. The Western Mail (5) reported, on 11 December 2024, that the 190-acre site in Anglesey, which was built in 2022, was devastated by Storm Daragh: 'hundreds of panels were shredded and torn off their fixings ... and residents living nearby now fear land contamination from shattered solar panels'.	The Applicant has prepared the Environmental Statement on the basis of the latest data available at the time of submission. The assessment is then carried out on a reasonable worst case basis in accordance with the Rochdale Envelope, using a 'maximum design scenario' to ensure that any conclusions on the significance of effects are robust, reliable and sufficiently precautionary'. Further information is set out in Chapter 4: Approach to Environmental Assessment [APP-041]. In relation to the solar farm in Anglesey that was impacted by Storm Daragh, the Applicant has provided further detail in response to that concern in its written summary of the Applicant's oral submissions at the Issue Specific Hearing 1 (ISH1) which has been submitted alongside this relevant representation response document at Deadline 1.]
1111	Sequential Test	Sequential Test	The identification of the site was undertaken through a rigorous site selection process; ES Chapter 5 - Alternatives Considered (APP-042). The report provides an explanation of the site selection process along with how the Scheme Project had considered alternatives taking into account wider environmental and planning considerations. The location of the Site was informed by the considerations outlined in the NPS in relation to the siting of solar PV development. In addition, a sequential approach to the location of the development has been undertaken regarding flood risk with development steered to the lowest area of risk. This approach is in line with NPPF. The approach is set out in the Flood Risk Assessment (APP-166).
RR-0038-001 Environment Agency	Inspections & Surveys	Issue	The inclusion of pre-works and post-works surveys of flood assets are to be added as a commitment to an updated version of 6.3 - ES Chapter 10 -

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
		Unknown condition and geometry of flood assets near cable crossings. Impact Potential damage to flood assets, increasing flood risk vulnerability Solution Conduct pre-works and post-works surveys of flood assets, considering settlement and vibration impacts. Include remediation for defects. Additional Comment The Applicant should consider as-built drawings and will need to carry out an investigation to determine the flood asset geometry and whether buried elements are present. EAREQ-001: We request the inclusion of a DCO Requirement to provide a pre-works and post-works survey of the flood assets intersected by the cable crossings with consideration of settlement and adverse effects from vibration. Remediation for defects identified. HDD offsets should be informed by as-built drawings and surveys.	Hydrology and Flood Risk [APP-047] as embedded mitigation as embedded mitigation.
	Horizontal Directional Drilling Cable Depth	Issue Proposed HDD depth may restrict adaptability of flood assets Impact The shallow depths of HDD may lead to increased flood risk if future flood defence assets cannot be adequately designed and installed. Solution Require a minimum HDD depth of 5m below hard bed and flood assets. Provide general arrangement drawings showing proximities. Additional Comments We are seeking a cable depth of 5m below hard bed and flood assets for main rivers to allow for future replacement of flood assets (e.g. sheet piling) and allow dredging of the watercourse in future. The Applicant has proposed a HDD depth of 2m below hard bed and 1.5m below flood assets. The proposed depth below a flood asset will need to be demonstrated to be safe. EAREQ-002: We request the inclusion of a DCO Requirement to ensure HDD occurs at a minimum cable depth of 5m below hard bed and flood assets.	The Applicant confirms that HDD depth under main rivers would be at least 1.5m below flood assets and 2m below hard bed. The minimum depths were established by EA guidance published on Gov.UK which states "the service crossing is at least 1.5m below the riverbed along its whole length, and the same height is maintained for at least 5m beyond each bank (measured from the top)." This has been presented and committed to as commitment 10.4 within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. The actual depth of the HDD at main rivers would likely be deeper. Drill profiles will be determined and confirmed depths provided during detailed design.

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
	Horizontal Directional Drilling Horizontal Distance (Entry / Exit Pits)	Issue Unclear compliance with local plan for main rivers. Impact Inadequate buffer from watercourses, increasing flood risk. Solution Maximise HDD entry and exit pit distances from watercourses, measured from top of bank or most landward extent of the flood asset (whichever is more conservative). Additional Comments The Applicant should look to maximise the distance of the HDD entry and exit pits distances from the watercourse, we would therefore look for there to be compliance with the local plan for main rivers. Note that this distance should be measured from the top of bank or most landward extent of the flood asset (whichever is more conservative). We would advise consistency across the whole site where feasible e.g., 10m. EAREQ-003: We request the inclusion of a DCO Requirement to maximise the distance of the HDD entry and 5 exit pits distances from the watercourse compliant with the local plan for main rivers.	The inclusion of a 10m buffer distance to be provided across the development from the banks of the watercourses, or the leeward extent of the flood asset (whichever is most conservative. This will be added as commitment to an updated version of 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation.
	Spoil from Excavation	Issue Potential placement of spoil in flood-prone areas. Impact Increased flood risk from displaced floodwaters. Solution Store spoil outside the design flood extent wherever possible. Additional Comments EAREQ-004: We request the inclusion of a DCO Requirement to ensure spoil is stored outside the design flood extent and outside of Flood Zone 3b.	The majority of temporary facilities will be placed outside of Flood Zone 3. However, 2 HDDs (two options in Swinford bridge HDD 6), and another one (HDD 12) have HDD construction compounds that are within flood zone 2/3. In these locations, any temporary spoil material during construction will be stored outside of Flood Zone 3.
	Freeboard to Solar PV Panels	Issue Proposed 200mm freeboard is insufficient to address flood risk. Impact Inadequate protection from flooding for PV panels and sensitive equipment. Solution A requirement regarding this issue is necessary. Please see Issue ref. EAREQ-005 below.	Solar panels will be located within Flood Zone 1. As such will sit outside of fluvial flood extents. The lowest leading edge of the panels will be set at 0.8m across the height. There are limited areas of the site where surface water flood depths could reach 600m in accordance with published surface water maps. At these limited locations, the panels will still have a freeboard, but this is less than 300mm. The area in question constitutes less than 1% of the total site area. Therefore, only a small portion of the solar panels would experience flooding at their base, and the depth of flooding is limited. A freeboard of 200mm is deemed appropriate in these locations, given the nature of the development feature type, which is waterproof. The design

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		Additional Comments EAREQ-005: We request the inclusion of a DCO Requirement relating to the solar panel freeboards and a level of 300mm.	team and client were comfortable with the impact that any minor flooding in these areas could have on the development and the operational capacity.
	Code of Construction Practice, Operational Management Plan, Decommissioning Management Plan	Issue Detailed Code of Construction Practice (CoCP), Operational Management Plan (OMP), and Decommissioning Management Plan (DMP) not yet developed. The construction phase flood risk management depends on the Outline CoCP. Impact Potential oversight in flood risk management and inadequate mitigation of construction-related flood risks. Solution Flood risk management to be included within the CoCP. Additional Comments The Environment Agency should be consulted on the detailed CoCP, OMP, and DMP.	Provision for preparation of a Flood Risk Management Plan to be prepared as part of the Outline CoCP, has been included as commitment 10.10 within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. The inclusion of this and the details during the Detailed CoCP preparation will include consultation with the EA.
	Design Life / Time-limited Agreement and Decommissioning Management Plan	Issue Uncertainty in decommissioning phase impacts on flood risk and the potential extension beyond 2069 without reassessment. Impact Adverse effects on flood risk during decommissioning and Increased flood risk due to outdated climate change projections. Solution Consult the Environment Agency on the DMP before decommissioning. Clarify timelines and components to be removed or retained. Additional Comments We would expect the Environment Agency to be consulted on the DMP prior to the decommissioning phase commencing. We note the inclusion of a requirement for decommissioning to be commenced no later than 37.5 following the date of final commissioning. However, if there are delays in construction and commissioning and the proposal is extended beyond 2069 (inclusive of the decommissioning phase), the reassessment of flood risk and mitigation will be needed as it would extend into the next climate change projection epoch https://www.gov.uk/guidance/flood-risk-assessments-climatechange-allowances	We note the comment regarding the potential for construction delays to potentially require a reassessment of flood risk and mitigation for the decommissioning phase. Should this occur then the EA will be reconsulted as part of a resubmission of flood risk and mitigation requirements.

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
	Evidence Gap(s) and the Placement of Components	Issue Flood risk hasn't been adequality assessed. There exist evidence-gaps relating to flood risk, notably for watercourse catchments of less than 3km² Impact Inappropriate placement of components, potentially increasing flood risk. Solution Address evidence gaps using appropriate methods. Place permanent development in Flood Zone 1, outside of the design flood extent, and 1000-year Surface Water Flood (SWF) proxies. Conduct site-specific hydraulic modelling where needed. Additional Comments The Applicant should ensure that where there are evidence gaps relating to flood risk that they have applied an appropriate method to ensure that the permanent development is outside of areas of flood risk. This should be a combination of placing components within Flood Zone 1, placing outside of the site-specific hydraulic modelling design flood extent, and placing outside of the 1000-year SWF proxies used for the fluvial flood risk of a watercourse (where the climate change uplift has been demonstrated to be conservative). Note that we would expect site specific hydraulic modelling of fluvial flood risk for main rivers. We need clarity about where the Applicant is proposing to use SWF modelling as a proxy for fluvial flood risk, this should be represented on a map for clarity. Similarly, it should be demonstrated where the Applicant is stating that the flood risk if purely SWF risk, as they are proposing permanent components in some of these extents. Notably the proposed substation(s) are potentially within an area which may be at risk of flooding, but this has not been modelled – this will need site-specific hydraulic modelling. As the flood risk in this area is complicated, it would be helpful to have a meeting to talk through which methods are considered acceptable for each watercourse where evidence-gaps exist within the study area. By way of example: FRA 3.4.15 which suggests that the section of the Central Site Area located in the Cherwell Council boundary is wholly located in Flood Zone 1. Along the Rowel Brook at coordinates (446312, 214649), the Flood Map for Planning (FMfP) does not show a representation of fluvial flood risk as the catchment is less than 3km² and there is no existing site-specific hydraulic modelling. In cases like this within the	The comment regarding catchments less than 3 km2 was received as part of the PEIR comments dated 30 November 2023 – 8 February 2024 (reference: XA/2024/100059/01-L01). Following receipt of these comments, RPS provided a technical note under reference: HLEF 82808_WestBotley_ResponsetoEA_TN_v1-FINAL dated 11th June 2024. This note provided further information regarding the points raised by the EA in the consultation comments. Following the submission of this note, a meeting was held by RPS with the EA on the 24th July to discuss the technical note. Most of the comments were agreed to have been resolved and clarified within the Technical Note during the meeting. However, additional information was requested for several outstanding comments, including catchments less than 3 km2. A further technical note was submitted on the 23rd August 2024 (reference: XA/2024/100059/01-L01). This latest technical note details how 1000-year surface water extents are used as a proxy to assess catchments of a small size using ReFH2 to assess the peak flows, as discussed and agreed in the aforementioned meeting.

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
		study area, we need specificity on the approach taken to address the flood risk evidence-gap. There exist at least three areas of concern within the southern parcel in the context of a fluvial flood risk evidence-gap, namely watercourses at coordinates (444840, 205274), (445353, 205449), and (446472, 205824).	
	Flood Zone 3a and 3b	Issue Unclear intersections of proposal with Flood Zones 3a and 3b. Impact Unknown impacts on flood risk from structures (temporary works, compounds, or permanent structures) within Flood Zone 3. Solution The Applicant should provide mapping that shows Flood Zones 3a and 3b in the context of the proposed components and the cable corridor route. The corridor route should minimise interaction with Flood Zone 3b, and route selection should be informed by this consideration. Additional Comments Part of the application site is likely to lie within the 3.3% annual exceedance probability (AEP) flood outline, which is identified by the Table 1 of the Flood Zone and flood risk tables of the PPG as within Flood Zone 3b (the functional floodplain). Please be aware that development should be avoided within the 3.3% AEP (Flood Zone 3b) where possible, which is defined by the PPG as land where water from rivers, or the sea, has to flow or be stored in times of flood.	The Applicant has, where possible, sought to direct the development to areas assessed as Flood Zone 1. However, there are, on occasion, other material constraints which direct development to a higher risk of flooding. An assessment of cable route corridor options was undertaken to assess multiple routes in line with environmental constraints. However, appropriate mitigation measures are implemented in these situations. In each instance, the crossing of floodplain 3b is necessary to facilitate the crossings, and therefore, modelling would be unlikely to add any further information to the chosen route.
	Reservoirs	Issue Potential impact on nearby reservoir. Impact Increased flood risk from reservoir failure. Solution Liaise with reservoir undertakers to assess impacts and acceptability of works near reservoirs Additional Comments Contact the Undertaker of Farmoor reservoir for their input, especially in relation to acceptability of works in proximity to the reservoir as this may pose a risk and require input from a qualified engineer to ensure this is safe.	One reservoir has been identified within the study area, which is Farmoor Reservoir. Whilst we note the comment, Thames Water are responsible for Farmoor Reservoir and has been consulted as part of the DCO application. Thames Water have raised no concern regarding potential impact to this reservoir or additional detailed assessment beyond that made within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047].

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	Flood Risk Assessment	Issue Potential gaps in the FRA. Impact Incomplete understanding of flood risks and mitigation. Solution Cross-check the FRA against government guidelines to ensure comprehensive coverage.	The FRA details how flood risk has been assessed by the NPPF (set out in Table 1.4) and NPS (set out in Table 1.3) of the FRA; ES - Appendix 10.1 Flood Risk Assessment [APP-166]. These tables set out the key provisions that were undertaken in line with the guidance. Additional information was added to the FRA since the PEIR comments were received from the EA. These consultation comments and responses are detailed within 6.5 ES - Appendix 9.16 Section 42 Consultation Responses [APP-165].
	Temporary Facilities Plan	Issue Lack of fluvial flood risk mapping in relation to temporary facilities. Impact Inadequate placement leading to increased flood risk. Solution Provide Temporary Facilities Plan relative to fluvial flood risk mapping, including hydraulic modelling and proxies. Additional Comments Provide the Temporary Facilities Plan relative to fluvial flood risk mapping used to inform the placement of components 10 (e.g., site specific hydraulic modelling flood extents and proxies for fluvial flood risk, and Flood Zones).	The majority of temporary facilities will be placed outside of Flood Zone 3. However, 2 HDDs (two options in Swinford bridge HDD 6), and another one (HDD 12) have HDD construction compounds that are within flood zone 2/3. The inclusion of a Temporary Flood Management Plan will be added as a commitment within the updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation.
	Crossing Schedule Map	Issue No map supporting watercourse crossings Impact Unclear assessment of impacts on watercourses and flood risks Solution Provide a map showing proposed crossings of watercourses within the Crossing Schedule.	A plan showing the location of the watercourse crossings will be overlain on flood maps and will be submitted.
	Buffers/ Easements	Issue Inconsistent buffer distances from watercourses and flood assets. Impact Increased flood risk and potential damage to flood assets. Solution Maximize component distance from watercourses, ensuring consistency across the site (e.g., 10m	Clarity will be added to updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] and supporting appendices to confirm that a 10m development stand-off buffer includes the construction phase. This will be added as an updated commitment within embedded mitigation. Buffer will be taken from the top of the banks of the watercourses. A plan will be provided to support the commitment.

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
		buffer). Clarify if buffers apply to construction phase works. Additional Comments We would look for there to be compliance with the local plan for main rivers. Note that this distance should be measured from the top of bank or most landward extent of the flood asset (whichever is more conservative). We would advise consistency across the whole site where feasible e.g. 10m. Please clarify if the buffer is also applicable for the construction phase works as a mitigation against damage to flood assets.	
	Updated Risk of Flooding from Surface Water data	Issue This section notes that the identified surface water risk is shown in the online EA Risk of Flooding from Surface Water (RoFSW) dataset. Please note, an updated RoFSW dataset was published on the 28th January 2025 which does include climate change for the 2050s epoch. Further information is available online here: : Updates to national flood and coastal erosion risk information - GOV.UK Impact Updated data is available which may change the flood risk understanding for smaller ordinary watercourses Solution In the light of updated Risk of Flooding from Surface Water (RoFSW) data it would be prudent to confirm that the conclusions of the original assessment using the 1 in 1000- year dataset still remain valid	RPS are undertaking a technical note, which will assess the existing and updated surface water mapping to confirm the approach remains valid. This will be supplied to the EA.
	Flood risk for the upper reaches of the Rowel Brook	Issue No consideration of flood risk in the upper reaches of the Rowel Brook has been provided within the Flood Risk Assessment other than a reference to the existing Flood Zones. Impact Flood risk to the development could be underestimated. Solution Consider the flood risk to the development associated with the Rowel Brook. The upper reaches of this watercourse do not have any Flood Zone mapping due to the small size of the catchment. Undertake an assessment of flood risk for the upper reaches of the Rowel Brook. Confirm if infrastructure is outside of the design flood extent. If infrastructure is being placed in areas of	The upper reaches of the Rowel Brook has a catchment less than 3 km2. A technical note was submitted on the 23rd August 2024 (reference: XA/2024/100059/01-L01). This latest technical note details how 1000-year surface water extents are used as a proxy to assess catchments of a small size using ReFH2 to assess the peak flows, as discussed and agreed in a meeting with the EA. As such, this assessment is included within the FRA surface water and ordinary watercourses section and considers the risk from this source; ES - Appendix 10.1 Flood Risk Assessment [APP-166].

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		flood risk associated with this watercourse, then hydraulic modelling will be required to quantify the risk to and from any development.	
	Flood Risk Summary Central Site reporting error	Issue This section notes that permanent development and temporary development have been restricted to area outside the 100 year plus 46% fluvial and the 1000 year surface water flood extent associated with ordinary watercourses. This is welcomed although it is not clear what scenario the 100 year plus 46% fluvial extent relates to as the higher central scenario for the Gloucestershire and the Vale management catchment for the 2050s and 2080s epoch respectively is 19% and 41%. For the Cotswolds management catchment this is 21% and 43% respectively Impact Climate change allowances presented appear to be incorrect which could be misleading. Solution Correct the section of the report which refers to the 1 in 100 year plus 46% fluvial extent or provide clarity as to what this scenario relates to.	Hydraulic modelling was undertaken to explore a greater developable area within the flood zones. The approach has since been simplified and development has been instead steered to Flood Zone (outside of the 1 in 1000 year extent). This updated approach will be detailed within an updated ES Appendix 10.1 Flood Risk Assessment [APP-166].
	Localised hydraulic model	Issue The checks of the Risk of Flooding from Surface Water (RoFSW) data for the Filchampstead Brook for the 1000-year scenario are welcomed. We note that the main substation, secondary substation, and NG substation are near this watercourse. Inspection of the updated RoFSW outputs (January 2025) show that the main substation as shown on drawing EN010147/APP/6.4 dated November 2024 intersects the RoFSW extent. Impact Flood risk to the main substation, secondary substation, and NG substation could be underestimated. Solution The applicant should undertake more detailed analysis for the Filchampstead Brook and associated tributaries in the form of a localised hydraulic model which demonstrates that substation is resilient to flooding and does not increase flood 13 risk elsewhere. This modelling could take the form of a simple 1d or 2d model. Specifically, this should focus on the watercourses which start at grid references 444810 205250 and 445380 205050 and the Filchampstead Brook (Main River section) down to Filchampstead. This	Comments regarding catchments less than 3 km2 was received as part of the PEIR comments dated 30 November 2023 – 8 February 2024 (reference: XA/2024/100059/01-L01) and this applies to Filchampstead Brook. Following receipt of these comments, RPS provided a technical note under reference: HLEF 82808_WestBotley_ResponsetoEA_TN_v1-FINAL dated 11th June 2024. This note provided further information regarding the points raised by the EA in the consultation comments. Following the submission of this note, a meeting was held by RPS with the EA on the 24th July to discuss the technical note. Most of the comments were agreed to have been resolved and clarified within the Technical Note during the meeting. However, additional information was requested for several outstanding comments, including catchments less than 3 km2. A further technical note was submitted on the 23rd August 2024 (reference: XA/2024/100059/01-L01). This latest technical note details how 1000-year surface water extents are used as a proxy to assess catchments of a small size using ReFH2 to assess the peak flows, as discussed and agreed in the aforementioned meeting.

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
		would provide confidence in the design flood level with regards to the substation, secondary substation, and NG substation	
	Hydraulic model sense checks	Issue The hydraulic modelling report is incomplete. The hydraulic modelling report for the River Evenlode is fundamentally the same as the hydraulic modelling report which was reviewed by the Environment Agency in November 2023.. With regards to the hydraulic modelling, several comments were raised by the Environment Agency on the modelling. The Environment Agency has not received any response in relation to the comments on the River Evenlode hydraulic modelling. A key comment was with regards to a verification exercise of the model results, for example comparing the median annual water level (L-med) at the gauge Cassington Mill gauge with the 2-year water level in the hydraulic model. Similarly, a sense check of design water levels in the hydraulic model against the historic water level record at Cassington Mill is required to verify the sensibility of the results Impact It is not possible to verify the model results. Solution Provide a response to the comments raised by the Environment Agency on the River Evenlode Hydraulic modelling in November 2023. A sense check of design water levels in the hydraulic model against the historic water level record is required This would involve extending the hydraulic model further downstream past the Cassington Mill gauge. If it is not possible a comparison of design flows at the model outlet with design flow estimates at the Cassington Mill gauge would provide some confidence that modelled flows are reasonable and of the right magnitude.	Hydraulic modelling and supporting hydrology was undertaken to explore a greater developable area within the flood zones. The approach has since been simplified and development has been instead steered to Flood Zone (outside of the 1 in 1000 year extent). This updated approach will be detailed within an updated ES - Appendix 10.1 Flood Risk Assessment [APP-166].
	Lumped flow estimation point	Issue Hydraulic model is incomplete thus flood risk not understood. A lumped flow estimation point is not included at the downstream end of the study extent, for example at the Cassington Mill gauge. This would enable comparisons to be undertaken with the flows at the outlet in the hydraulic model. Impact It is difficult to verify the model results as there is no flow estimation point at the catchment outlet. Solution	Hydraulic modelling and supporting hydrology was undertaken to explore a greater developable area within the flood zones. The approach has since been simplified and development has been instead steered to Flood Zone (outside of the 1 in 1000 year extent). This updated approach will be detailed within an updated ES - Appendix 10.1 Flood Risk Assessment [APP-166].

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		Consider adding a lumped flow estimation point at the downstream end of the study extent, at the Cassington Mill gauge. This would help to verify the hydraulic model flows at the catchment outlet and would add confidence to the model results.	
	Pooling group – Cassington Mill gauge	Issue The Cassington Mill gauge (National River Flow Archive Number 39034 – suitable for pooling) is not included in the pooling group which has been used in the hydrological assessment. This gauge should be included within the hydrological assessment as it is located on the watercourse which has been modelled. Impact The hydrological assessment would have benefited from the inclusion of the Cassington Mill gauge within the pooling group. This is a gauge which is located on the River Evenlode and including it would help to improve confidence in the design flow estimates for the River Evenlode. Solution Clarify the rationale for not including the Cassington Mill gauge in the pooling group and undertaking an Enhanced Single Site Analysis (ESS). Confirm if design flow estimates vary significantly if Cassington Mill is included.	Baseline model files to be supplied to the EA for their consideration. The surface water modelling was undertaken to support potential betterment upstream of Cassington and has been undertaken as enhanced mitigation, commitment 10.14 within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047]. At the detailed design stage, option modelling will be undertaken (where required) to quantify the betterment provided, and this will be submitted to the EA.
	Modelling review and commitment to betterment	Issue This section notes that design proposals for intervention measures are likely to be iterative and further stakeholder engagement is required. While this is welcomed, we appreciate that modelling has not been reviewed. Impact Flood risk is not understood. Solution Provide a copy of the hydraulic model files so that the baseline flood risk representation can be appraised. Once a proposed option is developed within the modelling water level and extent difference mapping should be presented so that any betterment can be quantified.	Baseline model files to be supplied to the EA for their consideration. The surface water modelling was undertaken to support potential betterment upstream of Cassington and has been undertaken as enhanced mitigation, commitment 10.14 within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047]. At the detailed design stage, option modelling will be undertaken (where required) to quantify the betterment provided, and this will be submitted to the EA.
RR-0308-004 Environment Agency	Buffer Zones	Issue The majority of watercourses will have a minimum buffer of 8m maintained during works to protect the feature. Impact	Clarity will be added to updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] and supporting appendices to confirm that a 10m development stand-off buffer includes the construction phase. This will be added as an updated commitment within embedded mitigation. Buffer will be taken from the top of the banks of the watercourses. A plan will be provided to support the commitment.

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
		Buffer strips less than 10m are not effective at allowing space for commuting by mammals and the maintenance of a natural river corridor. Solution Riparian buffer strips measure a minimum of 10m from the bank-top for all watercourses on the site, unless existing physical constraints prevent this, and that this is defined in the Outline CoCP. This will allow for the natural river corridor to be maintained and free movement of riparian mammals up and down the system.	
RR-0308-007 Environment Agency	Unassessed Watercourses	Issue Watercourses have not been assessed due to conclusion of zero impact through the use of riparian buffers, even though easements and buffers are under 10m from the banktop (i.e. 20 within BNG riparian zone), e.g. watercourses having an 8m buffer during works. Some easements are calculated from the centreline of the channel (Appendix 10.1 Sections 2.4.23/2.5.3) Impact Threats to the environment may not be properly quantified and possible BNG uplift for watercourses may not be achieved. Solution Either conduct MoRPh surveys/River Corridor Assessments to establish correct BNG and increase the buffer/easement distance. Additional Comments BNG watercourse metric should be applied if there is a watercourse within, or in 10m proximity of, the development site Red Line Boundary (RLB) including the riparian zone. Therefore, if there are watercourses, including ditches, still within the site boundaries, a BNG watercourse assessment should be applied and watercourse metric calculated.	Clarity will be added to updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] and supporting appendices to confirm that a 10m development stand-off buffer includes the construction phase. This will be added as an updated commitment within embedded mitigation. Buffer will be taken from the top of the banks of the watercourses. A plan will be provided to support the commitment.
RR-0308-008 Environment Agency	Watercourses not properly assessed/missed from assessments	Issue The Rowel Brook is hydrologically linked to SSSI site Rushy Meadows. It also discharges into the WFD waterbody "Oxford Canal" and as such takes its WFD classification from that waterbody, which is currently moderate, however it has not been assessed. Impact Not properly assessing watercourses, especially those with hydrological connections to SSSI sites, could lead to damage to SSSI sites and missed opportunities for ecological uplift.	6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] report will be updated to identify the location of the SSSI and proposed works upstream of this.

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		Solution Assess watercourses properly.	
RR-0308-009 Environment Agency	Missing and outdated guidance and policy	Issue: Some key guidance and policy documentation is missing or has been updated since issue of the ES: • The Water Supply (Water Quality) (Amendment) Regulations 2018 not cited. • Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019 not cited. 21 National Planning Policy Framework (NPPF) was updated following issue of the Environmental Statement (ES), in December 2024.The Environment Agency’s Approach to Groundwater Protection, February 2018. Impact Aspects of the ES may not adequately address current guidance and policy requirements. Solution Applicant to update references in the ES and ensure any relevant changes in policy or guidance are reflected appropriately	The ES will be updated to include the latest policy documentation. This will be included within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047].
RR-0308-010 Environment Agency	Hydrogeology	Issue: The summary of the hydrogeological setting of the Proposed Development presented in the ES is very limited, presenting no discussion of groundwater depths (such as presented in Table 5.5 of Appendix 10.7), anticipated flows within the onsite superficial and bedrock aquifers and potential connectivity between groundwater and surface water bodies Impact Limited groundwater characterisation information is presented or discussed, such that we do not consider the applicant has demonstrated a sufficient understanding of the hydrogeological setting of the site and therefore may not adequately identify all potentially significant risks posed by the development. Solution Applicant to provide greater detail with respect to the anticipated groundwater regime present within the Study Area.	The ES will be updated to include further details of the hydrogeology regime. This will be included within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047].
RR-0308-014 Environment Agency	Surface Water and Groundwater Abstractions	Issue:	The ES will be updated to include the noted abstraction licences. This will be included within 6.4 ES - Figure 10.12 [APP-100].

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		The baseline identifying the surface water abstraction licences currently in the study area is incomplete. Impact Without establishing the abstraction licenses within the baseline conditions, the ES cannot properly assess the potential effects of the proposed development on water quality and water users. Solution The following abstraction licenses should be included in the baseline conditions of the hydrology and flood risk chapter. • 28/39/16/0078 – Potable Water Supply (Thames Water Utilities Ltd) • 28/39/14/0294 – Spray Irrigation (Storage) • 28/39/14/0285 – Make-Up or Top Up Water (Amenity)	
RR-0308--015 Environment Agency		Issue: The applicant proposes to scope out impacts associated with temporary dewatering to enable construction, based on adherence to best practice method statements, and informed by proposed site investigation and monitoring. Impact Risk that the proposed best practice method statements may not be sufficient to protect groundwater quality from detrimental impacts. Solution We recommend that the applicant provides confirmation of the proposed scope of site investigation and monitoring, in particular in areas of the site underlain by Principal and Secondary A aquifers. We consider post-consent groundwater monitoring to be important for reducing uncertainty. Additional Comments The BGS groundwater level data presented by the applicant to date (Table 5.5) is highly limited, comprising eight records and showing groundwater being absent in some exploratory holes in total and ranging from 1.70 to 18.22 metres below ground level across other locations. The data indicates groundwater levels locally within anticipated PV array foundation depth, which may necessitate temporary or permanent dewatering. This should be considered by the applicant.	Groundwater monitoring requirements are to be added to 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047]. Further ground investigation will be undertaken in line with commitment 11.2, which will inform the design of the PV array foundations. It is not expected that any dewatering will be required. However, if it is, ground water levels would be expected to recover after construction. Commitment 11.3 also relates to remediation.

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RR-0308-016 Environment Agency	Groundwater dependent terrestrial ecosystems	Issue Although the report makes brief reference to groundwater dependent terrestrial ecosystems (GWDTEs) in Section 2.2.4 and reproduces the results of chemical and quantitative GWDTE tests for the various WFD Groundwater bodies present within the study area, the report does not provide a summary of designated GWDTEs within the study area (available at GWDTEs England). Impact Potentially significant groundwater dependent ecological receptors within the study area may not be suitably identified. Solution The WFD Assessment should be amended to take account of any GWDTEs within the study area	WFD Chapter will be updated to include further details on GWDTE's. To be included within 6.5 ES - Appendix 10.7 Water Framework Directive Assessment [APP-174].
RR-0308-006 RR-0308-017 Environment Agency	WFD Screening	Issue Matters screened in and out in Stage 1 are discussed in Table 5.4 of Appendix 10.7. Temporary dewatering to enable construction (construction phase) is screened out on the basis of adherence to best practice method statements, supported by site investigation and monitoring before, during and after dewatering and excavation activities. Pollution risk and altered drainage patterns from general construction activities (construction phase) are screened out based on adherence to best practice method statements and the temporary nature of the construction works. Creating or altering pathways along which existing poor quality groundwater can migrate (construction phase) is screened out based on adherence to best practice method statements and the temporary nature of the construction works. The information provided by the applicant to date is indicative that groundwater may be locally present at foundation depth Impact Risk that there is insufficient characterisation of groundwater levels and flows, and of shallow ground conditions, to ensure that the proposed mitigation is sufficient to protect the Secondary A and Principal aquifers underlying the site. Solution We recommend that temporary dewatering, pollution risk and altered drainage and creating or altering pathways should be screened in for consideration in the WFD Assessment	WFD Chapter will be been updated to include the temporary dewatering, pollution risk and altered drainage and creating or altering pathways to be screened in. This will be included within 6.5 ES - Appendix 10.7 Water Framework Directive Assessment [APP-174].
RR-0308-019 Environment Agency	Water Supply Strategy	Issue	Comment noted.

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		Water supply and demands for aspects of the construction phase of the project, such as Horizontal Directional Drilling (HDD) and dust suppression, have not been evaluated. Impact Access to water in the summer will not be possible outside of public water supply. Solution A Water Supply Strategy should be provided which provides an initial options appraisal of sources of supply, potential restrictions and plan to mitigate for water unavailability (e.g. on-site storage). Additional Comments The proposal description includes the need for HDD as a trenchless technique for the laying of below ground cables. This technique can require significant and continuous water supply which is not evaluated in the ES. Other consumptive 31 uses of water identified by the project description include dust suppression and washing. Surface water or groundwater abstraction will require licences determined and issued by the Environment Agency. There is a bespoke Thames licensing strategy which applies to applications for the consumptive surface water abstractions and groundwater abstractions in direct hydraulic continuity with a river or water dependent habitat features. For abstraction below 2 Megalitres per day (Ml/d), no abstraction can take place when the average of the daily mean flows of the preceding 5 days in the River Thames as gauged at Kingston is equal to or less than Q50 (1780 Ml/d). More information can be found in the Cotswolds and Thames Abstraction licensing strategies. This may have practical implications for the construction phase of the project as access to water will be limited for much of the summer season and during periods of prolonged dry weather outside of the summer. It is at the applicant's risk if the water supply has not been considered adequately. Underestimated licence determination timescales and inadequate preparation for licence conditions restricting access to water pre-commencement of construction may cause delays.	
RR00308-019 Environment Agency	Supplementary General Advice	Appendix 10.1 Flood Risk Assessment - Table 4.2 The heading within this table which states the 1 in 100 year +25% climate change scenario which is incorrect. This should be the 1 in 100 year plus 21% climate change scenario. This is a minor reporting error and will not affect outcomes but	Appendix 10.1 Flood Risk Assessment [APP-166] will be updated in line with the comments on the climate change scenario reporting. The Hydrology and Hydraulic Modelling reports will not be updated as development has instead been sequentially steered to Flood Zone 1. As such the hydraulic modelling approach has been made redundant for use in the study.

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		should be corrected as could be misleading. Correct this table to reference the 1 in 100 year plus 21% climate change scenario Appendix 10.1 Flood Risk Assessment - Section 3.4.29 Ordinary watercourses This section describes the climate change allowances for the Gloucestershire and the Vale management catchment, but no figure is presented within this paragraph. The higher central allowance for the Gloucester and the Vale management catchment for the 2050s epoch is 19% and for the 2080s epoch is 41%. The analysis presented in table 3.4 demonstrates that the 0.1% (1 in 1000) annual exceedance probability (AEP) Risk of Flooding from Surface Water is a conservative proxy for the 1% (1 in 100) AEP plus higher central climate change scenarios. The heading within this table states the 1 in 100 year plus 25% climate change scenario which is incorrect. This should be 1 in 100 year plus 19%. This is a minor reporting error and will not affect outcomes but should be corrected as could be misleading. Please correct the heading for table 3.4 to be 1 in 100 year plus 19%. Appendix 10.4 Hydrology Report Section 3.2 page 4. Update the text in the Hydrology Report regarding the catchment area as section 3.2 suggests this is 42,715 km² rather than 427.52 km². Section 3.7 page 7. Update the text within this section of the Hydrology Report as this appears to reference a catchment in Cumbria (Gaitle Burn).	
RR-0135-5 Cassington Parish Council	Solar Panel Runoff	Flooding As identified in the ES Volume 3 Appendix: Surface Water Modelling Report, as well as other chapters relating to flooding and drainage, Cassington has suffered from flooding in 2007 (West Oxfordshire District Council, 2008). Subsequently, Cassington flooded again in September, 2024 (Cassington Parish Council, 2024a). The two events were similar in that they both followed periods of intensive rainfall and both effected properties on Elm's Road. As correctly identified in the Surface Water Modelling Report, this flooding was pluvial, resulting from runoff into a natural drainage feature from the high ground to the north of the village to low ground underlain by Oxford Clay, a soil known for poor drainage characteristics. Both Jericho Farm and Worton are also threatened by flooding with the latter often having its main entrance road flooded. Mitigation for flooding at Cassington has been specifically planned on the basis of the Surface Water Modelling Report and is proposed as a combination	"The design of the solar banks incorporates a gap between the solar cells within the bank. The gap prevents precipitation from hitting the 'shadow side' of the panel. The gaps also reduce the buildup of water flowing towards the lowest leading edge of the panel. Therefore, reasonable measures have been, where possible, incorporated to maintain, as closely as feasibly possible, natural flow patterns. Further details of this approach, along with a typical image, have been provided in the updated Appendix 10.2 Conceptual Drainage Strategy [APP-174]. Alongside this, details of a review of the latest aforementioned literature will be undertaken. With respect to existing/historical flooding issues, the Applicant has undertaken surface water flow modelling of Cassington to gain a greater appreciation of the baseline flood conditions, and then sought options to help alleviate some degree of flooding to the benefit of the wider community. This is included in 6.5 ES - Appendix 10.5 Surface Water Modelling Report [APP-172]."

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		of shallow ponds, bunds and ditch widening to the north / northwest of the village (see Section 6.5 of the Surface Water Modelling Report). However, this modelling, and indeed the overall design of the Drainage Strategy is predicated on the contention that the Solar Arrays of this scheme will not add to the rate of water runoff from the land on which they are positioned. In Paragraph 3.13 of the Environmental Statement Volume 3, Appendix 10.2 it is stated: "Modelling work undertaken by Cook and McCuen (2013) shows that solar panels themselves do not have a significant effect on runoff volumes, peak flows or times to peak. However, where design decisions or lack of maintenance lead to bare ground then the peak discharge may increase requiring storm water management." The Drainage Strategy document goes on to state that peer-reviewed literature concluding that solar panels do lead to increased runoff cited by Cassington Parish Council (Cassington Parish Council 2022b, 2023, 2024b) are not relevant to the current development because the studies were mainly conducted in arid or semi-arid environments (see 4.17 – 4.19, Environmental Statement Volume 3, Appendix 10.2). These papers included Pisinaras et al. (2014) and Yavari et al. (2022). Pluvial flood risk has been identified as a critical issue for the Botley West Solar Power Station proposal by Clive Carpenter, GWP Consultants, Charlbury, Oxfordshire, an independent expert in Hydrogeology and Groundwater Resources with more than 30 years of post-graduate experience in water management and impact assessment projects in the UK and overseas, including technical leadership of flood risk assessments and flood alleviation strategies (Carpenter, 2024). In his preliminary assessment of the PEIR with respect to flood related matters for the Community Group, Stop Botley West, he specifically addresses recent evidence related to runoff from solar panels and states: "More recent research in this technical area however provides consistent conclusions that solar panels increase peak run-off, increase total flows and increase erosion compared to the pre-development situation. This more recent research is considered to better represent the micro-hydrology of, and the inter-relationship between, the solar panels, the below-panel shaded vegetation and the inter-panel access corridors." He cites three more recent peer-reviewed scientific studies in support of his statement: Gullotta et al. (2023), Galzki et al (2024) and Liu et al (2023). Mr Carpenter identifies that the consequence for the Applicant is that they will need to manage (capture, store and slowly release) the storm water	

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		rainfall run-off from nearly all 1,100 hectares of the development as opposed to the few hectares they are proposing (e.g. associated with substations), an underestimation of surface water flood risk by almost 3 orders of magnitude. Mr Carpenter identifies that surface water management of this scale will require significant use of land with implications for the design of the scheme. Although some precautionary design measures for the solar arrays are included in the Drainage Strategy (see Drainage Strategy 4.3.6 – 4.3.15) these are predicated on the assumption that solar panels do not increase runoff. Cassington Parish Council has written to West Oxfordshire District Council (Cassington Parish Council 2024c) requesting that the solar arrays on the hills above Cassington and Worton / Jericho Barns are removed from the Scheme. We believe that despite the measures proposed by PVDP in the Surface Water Modelling Report, failure to adequately account for increased runoff from solar arrays represents an increased risk of flooding for our village as well as for Jericho Barns and Worton. This problem may affect a much wider area than this as heavy rain in November, 2024 demonstrated that both the A40 between Cassington and Eynsham, and the A4095, between Bladon and Long Hanborough (near the Junction with Low Road) are also vulnerable to flooding. These are major transport routes through the area. We note that no modelling of flood risk has been undertaken for areas other than Cassington and therefore no additional measures proposed to mitigate increased rates of runoff from Botley West Solar Farm on these areas.	
	Land Drainage	Land drainage A letter from a Rural Business Management Consultant, Roderick Craig, on the 29th January, 2024 to the Cassington Parish Councillor, Alex Rogers, is particularly pertinent to questions around flooding risk (Craig, 2024). Mr Craig was involved in management of the Blenheim Estates land in question from 1978 to 2001 and he has acted as a consultant for the farmers of the land until 2022. Mr Craig points out that "A lot of the land is under drained at 22-yard intervals all of which will be severely compromised during construction. This will change water flow and certainly increase surface run off from untapped springs." Field drainage is necessary in the areas south of Bladon and in Purwell Farm because of the presence of heavy, poorly draining clays in the area. The matter of field drainage is dealt with in Sections 10.9.99 to 10.9.125. There is a statement here that field drainage will be restored following installation or avoided but it is unclear whether this	The inclusion of pre-works and post-works surveys of flood assets, including field drainage, will be added as a commitment to an updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. This commitment will also ensure that field drainage is restored for the operational life of the development.

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		refers to surface drainage structures (e.g. ditches) or to undersurface drainage. Elsewhere in the document, specific locations are mentioned but land drainage is stated not to exist. We believe that this matter has not been dealt with by RPS in consideration of the effects of construction. Sinking up to over a million piles up to 3m deep will undoubtedly disrupt and possibly destroy under drains to the agricultural fields of the area and again, pose an increased risk of flooding. These drains are typically 0.7m below the soil surface and are emplaced in soil using a trenching tool deployed behind a tractor (AHDB, 2018). It is not obvious how such equipment could be deployed in the Solar Farm after construction to replace damaged drainage. Mr Craig goes on to describe his concerns that the increased runoff and destruction of subsurface drainage could pose an increased flood risk in all of the catchments effected by the Botley West development and potentially further on down the Thames.	
RR-0135-7 Cassington Parish Council	Soil Compaction	Soil Compaction A study for the Welsh Government has identified soil compaction as a significant issue with the building of solar farms (ADAS, 2023). Compaction of the soil will result from vehicle movements, earthworks and the extensive pile driving of piles for mounting solar arrays into the land on which the Solar Power Station will be constructed. The only mitigation against compaction which is mentioned in the Conceptual Drainage Strategy relates to the use of geotextile underlays for maintenance tracks to prevent compaction during operational maintenance. There is no mention of soil compaction in the Conceptual Drainage Strategy with respect to pile driving and construction. Land in the Central Section of the Botley West Solar Power Station may be particularly vulnerable to soil compaction because of high moisture content resulting from the presence of subsurface clay (ADAS, 2023). Soil compaction damages soil structure, perhaps permanently in some cases (ADAS, 2023) and furthermore, may decrease the ability of the land to absorb water and increase rates of runoff.	As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. In addition, gaps are proposed between solar cells themselves, so that water will not fall from the lowest leading edge. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at the detailed design stage to ensure that the ground does not become bare due to the lack of maintenance, and therefore, the peak runoff discharge does not increase over time. 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233] includes mitigation measures for soil management (e.g. where construction has resulted in soil compaction, the areas between panel rows would be tilled/scarified to an appropriate depth and then re-seeded with an appropriate vegetation cover).
RR-0135-8 Cassington Parish Council	Infiltration Testing	Lack of infiltration testing There is no evidence of soil infiltration testing in the ES and indeed in one section (4.4.1 of the ES Volume 3 Appendix 10.2 Conceptual Drainage Strategy) it is claimed it is not needed. On examination of the PEIR Mr Carpenter concluded that this lack of infiltration testing was a critical issue and without it viability of proposed drainage schemes could not be demonstrated. Given the same flaws exist in the PEIR and the ES (i.e. lack of consideration of increased runoff from	The use of formal infiltration is not proposed. Instead, solar panels will promote the baseline conditions of the site. As such, provided there is no increased runoff as detailed and noted in the Conceptual Drainage Strategy, the infiltration rate will not impact current baseline flows. We note that the Stop Botley West campaign has commissioned a report by Carpenter (2024). Whilst we can not specifically comment on this report, we have reviewed the aforementioned recent reports referenced Gullotta et al. (2023), Galzki et al (2024) and Liu et al (2023). The review and supporting information will be provided in the updated Appendix 10.2 Conceptual Drainage Strategy [APP-174]. Where feasible, interceptor channels will be

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		solar panels and the lack of infiltration testing) this issue remains in the proposed project. We ask, how can the Applicant be confident that flood mitigation and drainage plans are effective without infiltration testing. 2.5 Routing of water entering the site The site has at least 10 Ordinary Watercourses passing through the development land parcels and numerous more ancillary drainage routes (Carpenter, 2024). This runoff increases the amount of water that captured and managed associated with the site (Carpenter, 2024). There is no evidence that PVDP or their consultants have considered this water in their Conceptual Drainage Strategy largely because they assume there is no additional flood risk arising from the presence of the solar panels. Such an omission increases the risk of flooding to vulnerable locations such as Cassington, Jericho Barns, Worton, the A40 and the A4095.	included at the lowest leading edge in order to help provide an improvement to the baseline conditions by slowing the flow. This will be investigated at the detailed design stage.
RR-0135-9 Cassington Parish Council	Construction Runoff	Construction runoff Construction phase surface water management requires the clarification of run-off water to reduce the inevitable increases in turbidity (sediment) that occurs during the construction period (Carpenter, 2024). Such clarification places further constraints on run-off management, necessitating further land take for settlement ponds and/or larger attenuation basins to restrict flows to low rates to enable the use of turbidity settlement units (Carpenter, 2024). Clearly for this development with dozens of micro-catchments flowing off hillslopes, this will necessitate dozens of construction phase retention basins and treatment facilities (Carpenter, 2024). There is no evidence to demonstrate that these issues have been adequately evaluated to confirm the construction of up to more than 2 million solar panels in a 1,100ha area is feasible (Carpenter, 2024).	The development will not commence construction until a Construction Surface Water Management Plan has been approved by the LPA in consultation with the LLFA in order to evidence adequate provision both in terms of runoff quantity (flow rates and volumes) as well as quality (pollution mitigation). This will be added as a commitment to 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232] and [APP-233].
RR-0135-17 Cassington Parish Council	Soil Compression	Soil compression resulting from construction traffic will certainly alter the hydrology of the affected sites. Furthermore, on the basis of the evidence presented above on increased runoff from the solar panels and damage to undersurface drainage hydrology will be altered both during construction and operation.	Mitigation measures for soil management will also be included in these documents and implemented (e.g. where construction has resulted in soil compaction, the areas between panel rows would be tilled/scarified to an appropriate depth and then re-seeded with an appropriate vegetation cover). Additionally, as stated in 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232] and [APP-233]. Pre-commencement surveys will be undertaken prior to construction on site to identify local drainage assets and infrastructure. A CoCP is to be provided as part of the application for development consent in line with the Outline CoCP and agreed with relevant stakeholders.
RR-0205-012 Cumnor Parish Council	CNP Flood Risk Assessment	It is self-evident that the applicant has neither read or understood the CNP Flood Risk Assessment, and so CNP policy RNE2. Even before considerations of altered run off due to expanses of impervious panels, hard standings etc., there are already substantial flooding issues within the proposed	ES Volume 1: Chapter 10 Hydrology and Flood Risk [APP-047] and associated 6.5 ES - Appendix 10.1 Flood Risk Assessment [APP-166] and 6.5 ES - Appendix 10.2 Conceptual Drainage Strategy [APP-167] have been prepared in line with the NPPF, NPS and local policies. We note the

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		southern site. At the time of writing (mid February 2025) fields within the proposed site are flooded – hardly surprising given the extent of EA Flood Zone 3 in the Farmoor valley. The requirements of Policy RNE2 have not been met and so the application is contrary to it.	comment regarding local planning policy RNE2 and as such the FRA will be updated to make specific reference to this policy.
RR-0375-5 Hanborough Parish Council	Road Flooding	The roads also frequently flood and run off from the building site will potentially increase this chance of flooding. In the winter of 2024/25, the villages of Church Hanborough and Long Hanborough became inaccessible because of road flooding. Mud from the site will cause a skid hazard.	"The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. A comprehensive literature review of how solar farms affect runoff and mitigation measures used during the design are outlined in the Conceptual Drainage Strategy for the site within ES Volume 3 Appendix 10.2: Conceptual Drainage Strategy [APP-167]. Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use. The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module. A second environmental benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project. Whilst we note this pre-existing flooding, the proposed design of the site is to ensure no significant increase in flood risk on or off-site. As part of the Project, solar arrays are to be placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. In addition, gaps are proposed between solar cells themselves, so that water will not fall from the lowest leading edge. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at detailed design stage to ensure that the ground does not become bare due to the lack of maintenance and therefore the peak runoff discharge does not increase over time. The sloping ground in this case will improve solar exposure.
RR-0784-4 North Leigh Parish Council	Solar Panels	Flooding Risks - increased risk of flooding due to solar panels Latest peer reviewed science shows that solar panels do exacerbate flooding events. Independent and highly qualified and respected hydrology experts have categorically stated in an extensive report, the conclusions of which have been shared with WODC, that the proposed project adds significantly to the risk of flooding in the Cassington area. Parts of Cassington have been flooded twice over the past 2 years. With increasing climate change, these events can only increase in frequency over the life of the solar farm. The independent report considers that the applicant has not demonstrated the feasibility or viability of their proposed drainage scheme. In particular, the report notes, "the lack of ground infiltration testing carried out by the applicant (is considered) to be a critical issue in that the	We note that the Stop Botley West campaign has commissioned a report by Carpenter (2024). Whilst we cannot specifically comment on this report, we will review the aforementioned recent reports by Gullotta et al. (2023), Galzki et al (2024) and Liu et al (2023). This review and supporting information will be provided in an updated Appendix 10.2 Conceptual Drainage Strategy [APP-174].

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		Applicant has no understanding of the extent to which they will be able to infiltrate water into the ground and therefore they cannot determine with any confidence, the size of attenuation ponds they require or whether there is room for the required size of ponds where they will be required to be sited."	
RR-1035-7 Tackley Parish Council	Flood Risk	The impact on flood risk.	An FRA has been prepared, which discusses the existing flood risk in the context of the development; Volume 3 Appendix 10.1: Flood Risk Assessment [APP-166]. This includes consideration of climate change in the sequential design of the solar farm and the conceptual surface water drainage strategy. It demonstrates that the development will not increase flood risk.
RR-1102-23 West Oxfordshire District Council	Cassington	West Oxfordshire District Council highlighted the potential for surface water impacts arising from the proposal to the north of Cassington through the pre-application consultation response. The applicant has undertaken modelling to assess potential for surface water impacts in this location and has proposed measures to mitigate the impact of the proposal and to provide betterment in relation to existing surface water conditions. These measures include the provision of SUDS, ditch maintenance and bunds to the north of Cassington. The council supports measures that would address existing issues of surface water flooding at Cassington. Consideration should be given to whether proposals for surface water drainage across the site would be acceptable. Further supporting information may be required, including ground investigation reports and detailed drainage layouts with identified discharge locations. Further detail should be provided on how the fields beneath the panels will be managed during construction, operation and decommissioning in order to maintain suitable vegetation cover beneath panels and to ensure that the soil is not compacted by machinery during construction and maintenance.	We note the comment regarding the surface water modelling that was undertaken for Cassington, which will be progressed further at the detailed design stage. Formal discharge locations are not proposed for the solar panels. As part of the Project, solar arrays are to be placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. In addition, gaps are proposed between solar cells themselves, so that water will not fall from the lowest leading edge. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at the detailed design stage to ensure that the ground does not become bare due to the lack of maintenance, and therefore, the peak runoff discharge does not increase over time. The sloping ground in this case will improve solar exposure. 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233], 7.6.2 - Outline Operational Management Plan [APP-234] and 7.6.4 - Outline Decommissioning Plan [APP-236] detail how fields beneath the panels will be managed during construction, operation and decommissioning. Detailed plans and layouts will be progressed at the detailed design stage, as set out in the above documentation.
RR-0164-0019 Cherwell District Council	Hydrology and Flood Risk	Acknowledging that OCC are the Lead Local Flood Authority this Council would like to make a number of observations. None of the sites within Cherwell appear to be in Flood Zones 2 or 3 but this might require further analysis when more detailed proposals are available. If any are found to be in the flood plain the implications will be fairly minor in that the displacement caused by the supporting posts will have to be compensated for. The Council do not consider this to be a major concern in principle.	No response required
	Utilities	The installation of Utilities that cross under ditches and watercourses by trenchless techniques is the preferred method. Further consideration, in liaison	The inclusion of pre-works and post-works surveys of flood assets, including field drainage, will be added as a commitment to an updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation.

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		with the other Local Authorities, is needed to establish if Land Drainage Act consents will be required for this. Regarding concerns about drip lines under the panels, the Council would expect to see the run-off from the panel fall onto filter drains and attenuation provided either within the drains themselves or at the end of each line or area before discharging to a ditch or watercourse. This would be a matter for the detailed design stage and could be covered by a requirement in the DCO.	This commitment will also ensure that field drainage is restored for the operational life of the development. As part of the Project, solar arrays are to be placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. In addition, gaps are proposed between solar cells themselves, so that water will not fall from the lowest leading edge. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at the detailed design stage to ensure that the ground does not become bare due to the lack of maintenance, and therefore, the peak runoff discharge does not increase over time. The sloping ground in this case will improve solar exposure. This is anticipated to mimic the existing baseline conditions and prevent all the water from reaching the lowest leading edge. This is favourable, where possible to prevent extensive drainage and piping across the site. However, the requirement and consideration of filter drains can be captured at the detailed design stage, where required.
RR-0793-010 Oxfordshire County Council	Surface Water Drainage	The proposals for surface water drainage across the site would be acceptable if further supporting information was provided, to include ground investigation reports, a more detailed drainage layout with identified discharge locations, updated calculations to correspond with the drainage layout, updated water quality and maintenance requirements, and further detail on how the field beneath the panels will be managed during construction, operation and reinstatement. Notwithstanding the above, OCC is concerned about the proposed protective provisions included at Part 3 of Schedule 15 to the draft DCO and is unconvinced by the various departures from the tried and tested consenting process under the Land Drainage Act 1991.	No formal drainage connections have been proposed for the solar panels at the site, and as such, no formal drainage connections are proposed. However, the Solutions Index Approach will be added to Appendix 10.2 Conceptual Drainage Strategy [APP-174] for the ancillary features where required to provide more clarity on water quality treatment. The development will not commence construction until a Construction Surface Water Management Plan has been approved by the LPA in consultation with the LLFA in order to evidence adequate provision both in terms of runoff quantity (flow rates and volumes) as well as quality (pollution mitigation). This requirement will be added to 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233]. Section 120 of the PA 2008 makes comprehensive and wide-ranging provision about what may be included in a DCO, as part of the PA 2008's integrated approach to consenting. Section 120(5) provides that, subject to specified limitations and requirements, a DCO may apply, modify or exclude a statutory provision which relates to any matter for which provision may be made in the Order; and make amendments, repeals or revocations of statutory provisions of local application. It is common for DCOs to contain such provisions to ensure that the DCO is a 'one-stop-shop' to consenting Precedent for the disapplication of the Land Drainage Act 1991 provisions at Article 6(1)(a)-(c) of the draft DCO [AS-009] can be found in the Longfield Solar Farm Order 2023, the Sunnica Energy Farm Order 2024, the Mallard Pass Solar Farm Order 2024, the Gate Burton Energy Park Order 2024 and The East Yorkshire Solar Farm Order 2025 (non-exhaustive list). These disapplications are sought on the basis that they address matters whose merits and acceptability can, and will, already have been sufficiently considered and resolved if the Order is made, through protective provisions for the protection of OCC as the relevant drainage authority (Part 3 of Schedule 15 to the Order). The Applicant's position which aligns with the standard approach on earlier comparable projects is that the matters should therefore not be the subject of further regulatory consideration or control, which would cause unnecessary uncertainty and duplication, and may unjustifiably delay the implementation of the Project. The Applicant notes

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			that the protective provisions at Part 3 are standard form and readily agreed across many made solar DCOs. However, the Applicant appreciates that the consent of OCC is required as Lead Local Flood authority in order to facilitate disapplication's under the Land Drainage Act 1991. The Applicant would welcome comments from OCC on its specific concerns with the drafting of the protective provisions at Part 3 to consider whether a bespoke set of protective provisions is required.
RR-0793-049 Oxfordshire County Council	LLFA	The submitted surface water drainage proposals have been reviewed by the LLFA. Please note that the LLFA primarily comments on surface water drainage, and flood risk where it may impact the functionality of the surface water drainage system. Comments from the Local Planning Authority district drainage engineers and Environment Agency will be required for a full overview of the flood risk present at the proposed development site.	No response required.
	Solar Panels	6.2 The solar panels themselves have no formal drainage proposed. The LLFA has previously commented that this is acceptable in principle, however it is important that there is a requirement in the DCO to maintain suitable vegetation cover beneath panels, and to ensure that the soil is not compacted by machinery during construction and maintenance. This should help to retain the existing greenfield runoff rate of the site. Where runoff from panels may cause localised erosion, consideration should be given to filter drains or an enhanced maintenance schedule for the soil/vegetation. Additional cutoff drains could be incorporated at the site boundaries as an additional measure.	As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. In addition, gaps are proposed between solar cells themselves, so that water will not fall from the lowest leading edge. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at the detailed design stage to ensure that the ground does not become bare due to the lack of maintenance, and therefore, the peak runoff discharge does not increase over time. 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233] includes mitigation measures for soil management (e.g. where construction has resulted in soil compaction, the areas between panel rows would be tilled/scarified to an appropriate depth and then re-seeded with an appropriate vegetation cover).
	Discharge Locations	6.3 Access tracks are to be permeable, which is acceptable. Infrastructure that does require formal drainage has been considered; however the detail required for typical outline development has still not been provided, despite the issue being raised in earlier consultation responses. The discharge location must be identified for all drainage features. If this is to be the ground, then infiltration testing and winter groundwater monitoring results should be provided in support of an infiltration drainage design. If it is to be a watercourse, the discharge locations should be identified on a drainage layout. Calculations have been provided in support of an attenuation strategy with restricted discharge to a watercourse.	A formal drainage plan is to be provided to detail the discharge approach and locations and details for the following infrastructure: NGET substation and Applicant Substation. This will be provided as further details come to light at the Detailed Design stage. In lieu of this, calculations and outline details have been provided in Appendix 10.2 Conceptual Drainage Strategy [APP-174].

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	Pollution Mitigation	6.4 Once an outline drainage strategy has been developed, further consideration of any pollution mitigation measures and maintenance requirements can be made. The surface water drainage details submitted should be in accordance with the relevant checklists provided in the Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire, available online	Formal drainage is not required for the majority of the site, as it is proposed to utilise the existing ground and/or gravel subbases beneath minor ancillary infrastructure. A formal drainage plan is to be provided to detail the discharge approach and locations and details for the following infrastructure: NGET substation and Applicant Substation. This will be provided as further details come to light at the Detailed Design stage. In lieu of this, calculations and outline details have been provided in Appendix 10.2 Conceptual Drainage Strategy [APP-174].
	Construction Phase	6.5 The LLFA would like to see consideration given to surface water management during the construction phase, this may be included in a Construction Environmental Management Plan (CEMP). The Applicant should provide detail as to decompaction measures to be employed post construction to ensure maximum infiltration potential is preserved.	The development will not commence until Construction Surface Water Management Plan have been approved by the LPA in consultation with the LLFA in order to evidence adequate provision both in terms of runoff quantity (flow rates and volumes) as well as quality (pollution mitigation). The requirement for this will be added to 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233]. Mitigation measures for soil management will also be included in these documents and implemented (e.g. where construction has resulted in soil compaction, the areas between panel rows would be tilled/scarified to an appropriate depth and then re-seeded with an appropriate vegetation cover).
	Summary	6.6 In summary, the proposals for surface water drainage across the site would be acceptable if further supporting information was provided, to include ground investigation reports, a more detailed drainage layout with identified discharge locations, updated calculations to correspond with the drainage layout, updated water quality and maintenance requirements, and further detail on how the field beneath the panels will be managed during construction, operation and reinstatement.	Formal drainage is not required for the majority of the site, as it is proposed to utilise the existing ground and/or gravel subbases beneath minor ancillary infrastructure. A formal drainage plan is to be provided to detail the discharge approach and locations and details for the following infrastructure: NGET substation and Applicant Substation. This will be provided as further details come to light at the Detailed Design stage. In lieu of this, calculations and outline details have been provided in Appendix 10.2 Conceptual Drainage Strategy [APP-174].
RR-0134-002 Cassington Allotment Association		Flooding: solar panels increase runoff - big problem for Elms Road and potentially ditch along allotments.	The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. A comprehensive literature review of how solar farms effect runoff and mitigation measures used during the design are outlined in the Conceptual Drainage Strategy for the site within Volume 3 Appendix 10.2: Conceptual Drainage Strategy [APP-167]. Compared to agricultural (arable and livestock) use, solar PV modules are likely to improve surface water drainage more than a continuation of the existing use. The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module. A second environmental benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project. Whilst we note this pre-existing flooding, the proposed design of the site is to ensure no significant increase in flood risk on or off-site. The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip

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			lines. The design of the solar banks incorporates a gap between the solar cells within the bank. The gap prevents precipitation from hitting the 'shadow side' of the panel. The gaps also reduce the buildup of water flowing towards the lowest leading edge of the panel. Therefore, reasonable measures have been, where possible, incorporated to maintain, as closely as feasibly possible, natural flow patterns. Further details of this approach, along with a typical image, will be provided in the updated Appendix 10.2 Conceptual Drainage Strategy [APP-174] A soil/grass management plan will be included at detailed design stage to ensure that the ground does not become bare due to the lack of maintenance and therefore the peak runoff discharge does not increase over time. The sloping ground in this case will improve solar exposure. The Surface Water Drainage Strategy for the Project also details how runoff from proposed new hardstanding areas will be managed throughout the Project. The FRA concludes that as a result of the solar Project there is no increase flood risk on site and off-site in line with the NPPF and NPS [APP-166].
RR-0134-007 Cassington Allotment Association		I also think run off during heavy rain might be a problem. At the moment there are pipes fitted underground in some of the fields on the hill to direct water into the drains but these will be broken when they drive the piles for the panels into the ground. When they build on Spring Hill at Yarnton - building which is about to start / Begbroke, Yarnton Rutten lane, Cassington road and Worton and the fields to A 40 have a good possibility in my opinion of flooding .	The inclusion of pre-works and post-works surveys of flood assets are to be added as a commitment to 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. This commitment will also ensure that field drainage is restored for the operational life of the development.
RR-0789-005 Oxford Capital Partners Holdings Limited		Exacerbation of risk of flooding in Oxford city and surrounding areas. The proposed farm is between two rivers (Cherwell and Thames) and adjacent to an increasingly built-up area which has already diminished natural water flows and drainage soakaways. This is an unknown consequential cost which the community would have to bear, not the solar developer or the Blenheim Estates.	An FRA has been prepared, which discusses the existing flood risk and in the context of the development; Volume 3 Appendix 10.1: Flood Risk Assessment [APP-166]. This includes consideration of climate change in the sequential design of the solar farm and Volume 3 Appendix 10.2: Conceptual Drainage Strategy [APP-167]. These reports that flood risk will not be increased and has been undertaken in line with the NPPF and NPS.
RR-1045-001 Thames Water		TWUL requires a thorough review of the Applicant's outline infrastructure drainage strategy, particularly where connections to TWUL's foul or surface water networks are proposed. If the Applicant intends to discharge into these systems, a pre-development inquiry must confirm network capacity. This assessment is crucial for identifying necessary upgrades and ensuring their timely delivery before the development connects. Without it, there is a risk of overloading existing infrastructure, leading to service failures or unplanned upgrades that could delay the development. TWUL notes that Requirement 9 provides for the Applicant to submit written details of the surface water drainage works and (if any) foul water drainage system (including means of	No connection is proposed to Thames Water assets. Additionally, as stated in 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233], pre-commencement surveys will be undertaken before construction on site to identify any local drainage assets and infrastructure. A Detailed CoCP will be provided as committed within the Outline CoCP. The CoCP will detail the requirements of pre-commencement surveys and best practice construction techniques to prevent damage to water supply and wastewater drainage infrastructure.

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		pollution control)), for approval by the local planning authority. Given the importance of such works to its network, TWUL requests that it is made a consultee for that Requirement to ensure the drainage proposals consider asset capacity, pollution control, and compliance with connection requirements. Further, TWUL is considering whether a standalone Requirement obligating the Applicant to submit a detailed drainage strategy for TWUL's approval before any connections are made is required. Should such a Requirement be necessary, it should stipulate that no part of the development may commence until TWUL has reviewed and approved the strategy, ensuring adequate capacity assessments and mitigation measures. This is essential to protecting network efficiency, preventing unplanned impacts, and supporting sustainable drainage solutions. TWUL will continue to keep this under review as further details of the Proposed Scheme are made available and will engage with the Applicant to agree a suitable DCO Requirement as necessary.	
RR-1050-001 The Friends of St Peter's Cassington		Our main objection to the solar scheme as trustees of the charity is the increased risk of flooding forecast to occur both from the extremes of weather, now being seen everywhere, and from the expected run-off from the proposed site, which being partly situated on hills above the village will be difficult to control or mitigate. There are 26 listed buildings in the village of Cassington. Flooding has recently come close to the church building and if this scheme is approved in its current form the risk of flood damage is increased, especially with the volume of concrete being used across the site and compaction of natural draining soil by vehicles and machinery being employed. This risk will also affect many households in the village, and in some cases may make property uninsurable. Flooding from water coming off the hills has recently caused disruption due to the closure of the main A40 road to Oxford, in spite of the natural flood plains and existing drainage which mitigate this.	The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. A comprehensive literature review of how solar farms effect runoff and mitigation measures used during the design are outlined in the Conceptual Drainage Strategy for the site within Volume 3 Appendix 10.2: Conceptual Drainage Strategy [APP-167]. Compared to agricultural (arable and livestock) use, solar PV modules are likely to improve surface water drainage more than a continuation of the existing use. The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module. A second environmental benefit of solar PV modules are soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project. Whilst we note this pre-existing flooding, the proposed design of the site is to ensure no significant increase in flood risk on or off-site. The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. The design of the solar banks incorporates a gap between the solar cells within the bank. The gap prevents precipitation from hitting the 'shadow side' of the panel. The gaps also reduce the buildup of water flowing towards the lowest leading edge of the panel. Therefore, reasonable measures have been, where possible, incorporated to maintain, as closely as feasibly possible, natural flow patterns. Further details of this approach, along with a typical image, will be provided in the updated Appendix 10.2 Conceptual Drainage Strategy [APP-174]

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			A soil/grass management plan will be included at detailed design stage to ensure that the ground does not become bare due to the lack of maintenance and therefore the peak runoff discharge does not increase over time. The sloping ground in this case will improve solar exposure. The Surface Water Drainage Strategy for the Project also details how runoff from proposed new hardstanding areas will be managed throughout the Project. The FRA concludes that as a result of the solar Project there is no increase flood risk on site and off-site in line with the NPPF and NPS [APP-166].
RR-1007-012 Stop Botley West Campaign		Sources of flood risk other than fluvial (such as surface water) do not appear to have influenced site selection to any material degree	The layout has been designed where possible to sequentially steer development (solar panels) to flood zone 1 and areas of low surface water risk. Where this has not been possible, such as cable routes, the applicant has sought to incorporate appropriate mitigation measures to manage any potential impacts by current industry best practice. The approach is set out in the Flood Risk Assessment [APP-166] .
RR-1007-045 Stop Botley West Campaign		3.8 Flood Risk 3.8.1 Paragraph 5.8.21 of NPS-EN1 sets out that the Sequential Test ensures a sequential, risk-based approach is followed to steer development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites within medium risk areas and then, only where there are no reasonably available sites in low or medium risk areas, within high-risk areas. That approach to the Sequential Test is also reflected in development plan policy as well as the National Planning Policy Framework. 3.8.2 Section 6.2 of the Flood Risk Assessment claims that the Sequential Test is passed at both a strategic level and a site-level. However, Chapter 10 of the ES dealing with hydrology and flood risk makes numerous references to features being within areas of surface water flood risk on the Site. A review of the Development Areas Plan against the recently updated Environment Agency Surface Water Flood Maps indicates numerous areas of operational development within areas of surface water flood risk. Most notably these include: • Southwest of Bladon Heath stretching down Burleigh Road to the railway line, particularly to the north east of the railway line; • East of Pinsley Wood and West of Lower Road near Church Hanborough; • Between Bladon Heath to the East and Begbroke; • North of Cassington; and • Various patches of surface water flood risk to the east of Wootton 3.8.3 It is not clear from the application material how these areas would be dealt with or why they cannot be avoided at the very least within the Site. As such, there is insufficient evidence that the sequential approach	"The identification of the site was undertaken through a rigorous site selection process; ES Chapter 5 - Alternatives Considered [APP-042] . The report provides an explanation of site selection process along with how the Scheme had has considered alternatives taking into account wider environmental and planning considerations. The location of the Site was informed by the considerations outlined in the NPS in relation to the siting of solar PV development.

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		to flood risk has been followed and the Project falls into conflict with NPS-EN1.	
RR-1076-008 Tom Lewis	Surface Water Flooding	18. Increased risk of surface water flooding due to land drain damage. Properties in the Parish are already at risk of fluvial flooding from some of the 10 watercourses throughout the area covered by the Project.	The inclusion of pre-works and post-works surveys of flood assets, including field drainage, will be added as a commitment to an updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. This commitment will also ensure that field drainage is restored for the operational life of the development.
18. Impact on School Sites			
RR-0793-064 Oxfordshire County Council	Impact on School Sites	OCC previously raised concerns about glint and glare and noise and vibration on school sites within proximity of the proposed development. These comments do not appear to have been taken into account in the submitted application.	Regarding noise and vibration impacts, please refer to the response below.
RR-0793-065 Oxfordshire County Council	Glint & Glare impact on School Sites	OCC (Property Team) has commented that it has reviewed the contents of the Glint and Glare Report (Volume 3, Appendix 4.4) and has some concerns regarding the impact of the proposed solar panels creating glint and glare issues to the playing area and building of both the preschool and primary school at Yarnton and the primary school at Cumnor. The technical study has not identified either the pre-school or primary schools as sensitive receptors, and therefore it is difficult to ascertain whether the proposed scheme will produce solar reflections that will have a detrimental impact on the staff and children of the primary schools and pre-school. Children spend a considerable amount of time outside, and it is therefore critical to ensure that the playing areas for the primary schools and preschool will remain a safe space for the children. Paragraph 193 of the NPPF highlights that under the 'agent of change' principle, those responsible must do all they can to ensure that new development will not have an adverse impact on the facilities of the primary schools and preschool and the children that are under their care. Therefore, OCC Property would need to be satisfied that the overall level of intensity of solar glare observed by children and school staff would be limited. OCC Property also raised the future proposals (allowed in outline at appeal, so far) to extend the recreation areas at Yarnton, and that the location and design of these should also be taken into account by the Applicant.	Commercial and educational properties are not typically considered within the standard methodology. This is because there is lesser significance on amenity compared to a dwelling as these properties are not inhabited permanently. Pager Power has considered Yarnton Preschool, William Fletcher Primary School, and Cumnor C of E Primary School alongside the geometric modelling and it can be determined that no impacts are predicted towards these schools. Any predicted solar reflections towards Yarnton Preschool and William Fletcher Primary school will be screened such that significant views of the reflecting panel are not possible. Solar reflections are not geometrically possible towards Cumnor C of E Primary school as the establishment is located due south of the panel area.
RR-0793-066 Oxfordshire County Council	Noise impact on School Sites	OCC have concerns that the noise and vibration impact assessment does not include schools.	The noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference EN010147/APP/6.3, with additional

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			information provided in ES Volume 2 (Figures) [EN010147/APP/6.4], and ES Volume 3 (Appendices)[EN010147/APP/6.5]. The assessment shows that sound from the development will be equal to or below the background sound level at residential receptors and so will not be a significant source of sound. The schools which are located close to the site boundary have been identified as; • The Marlborough Church of England School • Bladon C of E Primary School • LVS Oxford - Special Education School in Oxfordshire • William Fletcher Primary School • St Peter's C.E. Primary School • Eynsham Primary School These school are located at a greater distance from the site boundary than other nearby noise sensitive receptors. The assessment identifies that sound from the development will be below the background sound level at each residential receptor which has been identified, and so the impact at the school will be either equal to or less than this potential noise impact, on the basis of distance if the residential receptors are closer in all cases than the schools. Further, the assessment utilises the methodology stated in British Standard 4142:2014+A1:2019 – 'Methods for rating and assessing industrial and commercial sound', which is only applicable to residential receptors.
19. Land Agreements			
271	Land Agreements	Pursuant to section 56 of the Planning Act 2008 and / or Regulation 16 of the Infrastructure Panning (EIA) Regulations 2017, I am a Person with an Interest in Land (PIL) wholly surrounded and impacted by the proposed Botley West Solar (BWS) installation. I believe that I therefore have Statutory Consultee status. 5. My home is in the centre of what BWS calls the 'central' section of the three main site plots, North, South and Central. Goose Eye Farm is the T-shape in white in the centre of the below two maps.	The Party is included in the Book of Reference (Plot numbers 8-29) as both a subsoil owner of one of the cable routes running underneath public highway, and in respect of various rights (Plot 8-27, 8-31, 8-32, 10-02, 10-07 and 10-12) on neighbouring land to his own registered land title. The Land & Rights Negotiations Tracker contains details of negotiations with all freeholders of land which fall within the Order Limits and required for the Project. The above plots were not included in the Land and Rights negotiation tracker because they fall outside of the Order Limits, there is no infrastructure proposed on his land and the land is not required for construction access, haul roads, compounds, or any other temporary use in connection with the Project. The Applicant's Agent made contact with the Party to request access for a Great Crested Newt (GCN) survey. Communication attempts were made with regard to the surveys and ongoing through all stages of consultation, which confirms the Applicant has met its duty to consult on the proposals for the Project and allowed for submission of feedback. All letters were sent to the Party's address. The Applicant had correspondence with the landowner from August 2022 to discuss the potential impacts of the proposals for the Project on Goose Eye farm. Face to face and online meetings were held with the landowner and Applicant. The landowner decided to pause discussions on the impact of the Project on Goose Eye Farm. The Applicant pointed out that the installation area had been designed with some panels removed from views from the land to improve the overall setting.

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			The Applicant is aware that Mr Dryden has an easement over this water pipe. The <u>design of the</u> installation area for panels has taken the water pipe into consideration.
597	Land Agreements	Ref Section 56 Planning act 2008 regulation 9 & 16 We have become aware of a notice attached to the telegraph post on Land adjoining East View Cumnor Road Farmoor OX2 9NS. The registered owner of this land is [redacted] I am confused as to what this notice refers to and would welcome being contacted by you office to discuss as I have tried without success to contact the freephone number for the development but have had no response.	As part of the diligent inquiry process the Applicant has conducted during the DCO application process, the Applicant reviewed and contacted all parties who have an interest in land that may be affected by the Project and make reasonable efforts to consult with those land interests. During the Section 56 process, the Applicant's Agent received a Return to Sender for the Section 56 Notice that the Applicant attempted to serve on title ON261654. Further enquiries and desktop land referencing were made to obtain alternative contact details to confirm who now holds the interest in the land, however no alternative contact details were found. As part of the Applicant's diligent inquiry. The Applicant's Agent has been instructed to carry out further due diligence and investigate further to try and identify who may hold this interest.
272	Tenant Farmers	Local tenant farmers were told their tenancies were ending a year before the solar project was announced and had to sign non-disclosure agreements. This is unacceptable treatment of tenant farmers.	Blenheim Estate began discussing the project with affected farmers during the week of 22 nd November 2021. These first discussions took place informally and in good faith, outside of non-disclosure agreements. These meetings triggered a period of discussions during which agreements were reached, securing vacant possession of the land for this project. Of the three longer term Agricultural Holdings Act tenancies, independently negotiated settlements for two were reached in Spring 2022 and the third in Spring 2023. These agreements included standard wording, agreed by all parties, including non-disclosure provisions. Compulsory purchase powers were not used as part of the surrenders
393	Land Stewardship	Land stewardship of the solar farm once completed will be open to tender. While I understand the competitive reason for this I would have it as a condition that Blenheim Estates will be responsible for this – it being their land, their responsibility and they are residents. A company that is based miles away with possible minimal concerns for the local residents would cause significant problems over the 40 year period (and possibly more).	The Applicant is discussing a number of land management options with interested parties, including current landowners, but no formal decision has currently been taken.
718		Blenheim owns the land and offered it to the developer, terminating the tenancies of farmers under NDAs or listing them for compulsory purchase.	Blenheim Estate began discussing the project with affected farmers during the week of 22 nd November 2021. These first discussions took place informally and in good faith, outside of non-disclosure agreements. These meetings triggered a period of discussions during which agreements were reached, securing vacant possession of the land for this project. Of the three longer term Agricultural Holdings Act tenancies, independently negotiated settlements for two were reached in Spring 2022 and the third in Spring 2023. These agreements included standard wording, agreed by all parties, including non-disclosure provisions. Compulsory purchase powers were not used as part of the surrenders
1016		It should be noted that 90% of the land is owned by, and generously benefits, just one organization.	Noted.

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20. Landscape and Visual Impacts			
2, 4, 5, 18, 19, 21, 23, 24, 26, 37, 41, 63, 73, 76, 80, 91, 97, 99, 109, 117, 161, 173, 184, 187, 194, 198, 201, 204, 212, 213, 214, 221, 229, 230, 231, 233, 248, 251, 252, 255, 271, 280, 286, 287, 288, 290, 294, 296, 297, 299, 300, 301, 313, 314, 317, 326, 330, 333, 334, 337, 338, 350, 353, 363, 382, 388, 419, 429, 442, 446, 453, 457, 467, 489, 498, 500, 509, 513, 528, 535, 542, 544, 550, 551, 553, 564, 565, 572, 581, 584, 585, 586, 592, 601, 602, 610, 628, 629, 631, 633, 637, 638, 648, 649, 651, 655, 667, 669, 670, 676, 685, 690, 691, 708, 712, 715, 718, 728, 730, 731, 732, 736, 742, 746, 748, 753, 754, 756, 759, 769, 770, 775, 782, 785, 795, 799, 809, 810, 813, 819, 821, 824, 828, 834, 840, 842, 845, 852, 861, 862, 866, 872, 881, 888, 893, 897, 898, 908, 910, 911, 912, 917, 919, 923, 924, 931, 934, 938, 941, 950, 955, 960, 973, 978, 979, 993, 996, 998, 1003, 1007, 1009, 1019, 1031, 1036, 1037, 1040, 1043, 1047, 1048, 1052, 1053, 1063, 1064, 1068, 1077, 1078, 1080, 1087, 1090, 1093, 1096, 1114, 1115	Visual Impact	Concerns regarding the visual impact of the Project. Particularly views from public rights of way.	The potential impacts of the Project upon all sensitive Landscape and Visual receptors, within the 5 km Study Area, including views from Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. Thirty three photomontages [APP-072 to 080] were completed as part of the LVIA. The locations of these were agreed with statutory consultees and are considered appropriate and the number proportionate to the Project. They and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP_149]. This has ensured that the Project was visualised and assessed at different times of the year, including when the screening effects of vegetation are lower. Consultation with the host authorities was carried out to determine the suitability of the selected Representative Viewpoints. Where alternative / additional Representative Viewpoints were suggested or asked for, these were visited and either included as part of the final selected Representative Viewpoints or discounted. Refer to individual host authorities within table 8.5 of the LVIA [APP-045]. This included referral and consideration of Important Views as detailed in the Cumnor Parish Neighbourhood Plan. A number of Representative Viewpoints are selected as representative of these important views where possible on publicly accessible locations. Not all important views were considered relevant due to the direction of the views. The LVIA chapter of the ES concludes there would be significant effects on users of public rights of way within or immediately adjacent to the Project during operation and maintenance, at completion. By Year 15, once planting matures, these effects would not be significant. With regard to the reference to the location of the Project, The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm Project [APP-225]. At Appendix 8 to the PSS is the Very Special Circumstances case in respect of that part of the Project that falls within the Oxfordshire Green Belt. The LVIA chapter of the ES also includes landscape character assessments. The Project is located within multiple landscape character areas / types, as derived from the available local authority landscape character assessment(s). There would be a Minor to Moderate adverse (not significant) significance of effect upon those landscape character areas as a whole within which the Project is located. At a local level, landscape characterising effects upon the Project site, within a small part of the LCA(s) is considered to be Moderate adverse (not significant). Issues of visual intrusion, use of agricultural land, and amenity are assessed and can be found in the ES at Chapter 8, Chapter 17 and Chapter 16 respectively [APP-045].
2, 3, 5, 8, 9, 19, 33, 37, 41, 52, 65, 91, 114, 204, 248, 287, 313, 324, 334, 337, 353, 382, 386, 393, 400, 401, 402, 403, 411, 416, 433, 461, 462, 472, 479, 496, 511, 517, 531, 577, 611, 612, 613, 616, 664, 686, 698, 700, 702, 706, 726, 727, 818, 821, 829, 830, 851, 869,	Landscape Impact	Concerns regarding the landscape impact of the Project.	The potential impacts of the Project upon all Landscape and Visual Resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045] .

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887, 919, 924, 970, 971, 976, 979, 985, 989, 1003, 1007, 1016			
2, 12, 13, 16, 17, 19, 25, 29, 31, 40, 45, 49, 52, 57, 61, 62, 86, 96, 101, 112, 122, 123, 124, 207, 209, 216, 220, 228, 241, 245, 254, 255, 256, 257, 258, 263, 267, 269, 272, 275, 282, 285, 292, 296, 299, 305, 306, 309, 317, 324, 329, 330, 332, 337, 338, 345, 346, 350, 370, 383, 394, 395, 399, 407, 409, 417, 420, 421, 423, 424, 425, 434, 438, 439, 441, 446, 448, 451, 452, 459, 464, 474, 477, 478, 479, 481, 484, 486, 487, 490, 491, 492, 495, 497, 499, 501, 502, 503, 505, 506, 512, 513, 515, 520, 522, 529, 533, 534, 537, 538, 541, 543, 544, 546, 547, 548, 549, 551, 552, 553, 557, 558, 559, 564, 567, 568, 569, 571, 573, 574, 575, 576, 579, 580, 582, 586, 589, 590, 593, 595, 596, 598, 605, 609, 606, 611, 617, 619, 621, 623, 624, 625, 627, 630, 637, 638, 640, 641, 647, 649, 651, 652, 654, 660, 661, 662, 663, 665, 672, 675, 677, 688, 690, 697, 703, 713, 719, 728, 729, 738, 749, 751, 755, 756, 763, 774, 775, 777, 779, 795, 797, 798, 799, 800, 805, 807, 808, 810, 812, 814, 821, 823, 825, 826, 827, 831, 835, 839, 843, 846, 847, 848, 850, 854, 855, 862, 859, 863, 864, 865, 869, 875, 877, 882, 884, 885, 888, 900, 902, 910, 911, 914, 916, 917, 919, 921, 925, 928, 930, 936, 940, 943, 944, 945, 946, 947, 948, 949, 957, 959, 961, 965, 968, 974, 1004, 1005, 1009, 1011, 1014, 1016, 1019, 1020, 1021, 1022, 1023, 1026, 1030, 1033, 1036, 1038, 1039, 1041, 1093, 1007, 1059, 1068, 1069, 1082, 1083, 1084, 1094, 1101, 1104, 1114, 1115	Scale of the Project	Concerns regarding the scale of the Project.	The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection offer. The Project will have an anticipated generation capacity of approximately 840 MWe (AC output - total installed capacity approximately 936,000 kVA), which will provide secure and clean energy to the equivalent of approximately 330,000 homes. When viewed on plan, the scale and land use of the Projects is proportionate to the amount of energy it generates as a Nationally Significant Infrastructure Project scale appears to be substantial. However, when viewed from the ground, because of the spread-out nature of the three separate Project sites, there will be no location from where the Project will be visible in its entirety. Rather, public rights of way users, for example, will have transitory glimpses of views to parts of it. The Landscape and Visual Impact Assessment [APP_6.3] has identified and acknowledged a number of significant effects upon visual amenity, including. Particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified. There would be significant effects on users of public rights of way within or immediately adjacent to the Project during operation and maintenance, at completion. By Year 15, once planting matures, these effects would not be significant. Designed-in mitigation, as shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228], includes supplementing existing vegetation as well as and new planting including new hedgerows, trees and woodland. This over time, along with substantial areas of existing new woodland planting, would break up the overall mass scale of the Project within views, over time. Low-lying solar panels following the existing contours, along with gaps between rows and available views under the panels, would further reduce the absolute visual effects of the Project.
18, 105, 112, 114, 119, 121, 138, 204, 209, 218, 221, 287, 325, 362, 589, 633, 719, 745, 753, 763, 1028, 1060, 1061, 1105, 1007,	Buffer Zones	Concerns regarding the adequacy of proposed buffer zones incorporated within the Project. Particularly in relation to residential properties / settlements.	Professional judgement was used to determine a minimum 25 m buffer zone, from individual properties and settlements, has been incorporated into the Project. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which would further limit the effects of the Project. Additional mitigation, as shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228] , was included to further screen available views from residential properties.
5, 6, 18, 48, 61, 63, 72, 76, 83, 87, 89, 90, 100, 109, 110, 112, 113, 115, 119, 120, 124, 126, 138, 139, 140, 145, 153, 156, 161, 173, 184, 190, 198, 199, 201, 204, 206, 215, 217, 221, 227, 229, 237, 240, 243, 246, 248, 252,	Public Rights of Way	Concerns regarding the impact on local Public Rights of Way.	The potential impacts of the Project upon all sensitive Landscape and Visual Resources and receptors, within the 5 km study area, including the available views from local Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3] .

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253, 255, 260, 262, 272, 278, 279, 280, 282, 286, 288, 292, 295, 301, 303, 310, 313, 327, 331, 340, 342, 343, 356, 360, 362, 366, 368, 383, 384, 392, 395, 396, 428, 444, 446, 454, 466, 468, 475, 480, 482, 496, 512, 522, 531, 541, 542, 551, 566, 598, 599, 630, 632, 633, 634, 635, 637, 639, 641, 645, 649, 651, 665, 688, 690, 714, 723, 728, 745, 747, 750, 753, 770, 780, 797, 814, 815, 822, 825, 826, 827, 832, 837, 838, 841, 852, 868, 872, 881, 888, 893, 898, 901, 903, 905, 906, 908, 910, 916, 919, 920, 926, 927, 935, 939, 950, 963, 995, 1003, 1004, 1010, 1029, 1036, 1048, 1056, 1065, 1080, 1088, 1105			Project Impacts will be mitigated against by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerow would be managed to an appropriate height (3m to 4m) which over time would help to screen some available views to the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured., however, due to the undulating nature of the topography in the local area it would not be possible to entirely screen the Project. However, there would be no location along the public rights of way network where an visual appreciation of the whole Project would be possible. Rather, there would be intermittent, transitory views to parts of it. The effect is therefore lessened. Within the LVIA, 55 No. Representative Viewpoints were selected and agreed with the host authorities. These included a number of views from public rights of way, including the Oxfordshire Way Recreational Route (Representative Viewpoint 9 and 10). There are no significant adverse effects identified from the Oxfordshire Way or other Recreational Routes. It is acknowledged that the Project would result in a number of significant adverse visual effects. Particularly from a number of other public rights of way, such as 416/5/10 and 416/5/20 within the northern section of the Project near Lower Dornford Farm, in proximity to or passing through the Project. The LVIA chapter of the ES concludes there would be significant effects on users of public rights of way within or immediately adjacent to the Project during operation and maintenance, at completion. By Year 15, once planting matures, these effects would not be significant. Public rights of way flanked by hedgerows and / or trees is characteristic elements in of the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and, in places, green corridor. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wider green corridor not uncharacteristic of the current situation and existing landscape. Additionally, new permissive footpath and cycle path routes would be created by the Project. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. For example, between Bladon and Campsfield.
RR-0784-12	Amenity Value Degradation	Destruction of Amenity The amenity of many communities in and around the Botley West site will be damaged by this project. Exposure to green space and the opportunity to exercise on locally available land have both physical and mental health benefits. The main PRoWs used by the residents of many villages will be severely degraded in terms of their visual aspect, from one of open farmland to one of a largely artificial landscape dominated by solar panels. For instance, the developer's DCO application acknowledges that Combe village lies in a 'zone of theoretical visibility'. The highly prized views in and around	The potential impacts of the Project upon all Landscape and Visual Resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3]. Project Impacts will be mitigated by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. It is not possible to screen all available views to the Project. As this would not be appropriate from a landscape characterising perspective and, due to

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		Combe will thus be compromised. As a further example, in the Cassington parish the most heavily used public rights of way from the village will be surrounded in large parts by solar arrays. Both the northern and southern sections of the Botley West site will be similarly impacted. Even though an extension of the network is offered with extra "permissive" footpaths, the consultation fundamentally ignores why people want to walk in the countryside – i.e. for their mental well-being. This would not be achieved by walking through a forest of fencing and solar arrays. The solar panels will be visible from vast areas of West Oxfordshire.	the nature of the landscape, views would remain to parts of the Project even with mitigation in place. The Landscape and Visual Impact Assessment [APP_6.3] has acknowledged that there would be some significant effects as a result of the arising due to the implementation of the Project. Particularly from public rights of way. However, on balance these effects have been minimised, by landscape mitigation proposals would be mitigated, and the overall effect of the project is not judged to be significant. The Zone of Theoretical Visibility highlights areas of land within which parts of the Project would theoretically be visible. This includes areas of land that are not publicly accessible and from where views are not possible, due to access, e.g., fields with no public rights of way crossing them. The Landscape and Visual Impact Assessment [APP_6.3] has assessed the effects of the Project from the selected and agreed Representative Viewpoints that are publicly accessible. Views and amenity of individual residential properties has been scoped out, due to the nature of the Project and the landscape in which it is located. The physical effects of the development on the public rights of way network is further assessed in ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. The effects on mental wellbeing of residents is looked at within ES Chapter 16: Human Health [APP_053].
RR-1112-1	Amenity Value Degradation	Loss of amenity including rural walks in a natural environment.	The effects on public rights of way network is further assessed in ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. The existing public rights of way network would be retained and managed during the construction of the project in accordance with the outline Public Rights of Way Management plan [APP-232]. They would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. As such, the public's access would not be restricted. For more information on effect on the public rights of way network see ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054].
RR1007-044	Amenity Value Degradation	3.7.3 Despite the content of the Planning Supporting Statement, Chapter 8 of the Environmental primarily focuses on broader landscape and visual impacts rather than specifically addressing residential amenity. Whilst the LVIA includes assessments of visual effects from various representative viewpoints, it does not provide a detailed analysis of how the proposed development might directly impact the living conditions of nearby residents, such as potential issues related to glint and glare or changes in visual amenity from private properties. 3.7.4 The lack of a focused evaluation on residential receptors means that potential adverse effects on local inhabitants may not have been fully considered or mitigated. This prevents readers from obtaining a comprehensive understanding of the project's potential impacts on local communities	The Zone of Theoretical Visibility highlights areas of land within which parts of the Project would theoretically be visible. This includes areas of land that are not publicly accessible and from where views are not possible, due to access, e.g., fields with no public rights of way crossing them. The Landscape and Visual Impact Assessment [APP_6.3] has assessed the effects of the Project from the selected and agreed Representative Viewpoints that are publicly accessible. Views and amenity of individual residential properties has been scoped out, due to the nature of the Project, the landscape in which it is located and the landscape mitigation, including offsets, as shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. A Glint and Glare assessment has been undertaken for the Project and is included [APP-128].

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RR-0205-11		The effects of attempting to mitigate the presence of 2.3m high PV panels, security fences and CCTV cameras through planting hedges and allowing them to grow higher, will by its very nature irrevocably change the lived experiences of walkers, cyclists and horse riders. No longer will they experience open views across arable farmland. Instead, they will be confined to narrow canyons within high vegetation, all accompanied by the hum of electrical equipment.	The potential impacts of the Project upon sensitive landscape and visual and receptors, within the 5 km Study Area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment (LVIA) [APP-045]. All existing public rights of way will be retained on their current route. A minimum of 5m width has been allowed for public rights of way between hedge boundaries. In many locations this has been significantly increased, as shown in Figure 7.6.3.2 of the oLEMP [APP-235]. This will allow views out from the public rights of way to the surrounding landscape and local landmarks, such as the Church of St Peter & St Paul, Church Hanborough. The LVIA [APP-045] has identified and acknowledged a number of significant effects upon visual amenity particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP-045], at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape.
RR-0135-4	Disruption of Local Connectivity	One example of this has been the finding of moderate adverse impacts on many of the footpaths but then the downgrading of this to non-significant in further consideration. If the entire footpath network in the Cassington area is moderately impacted (and some of it is "major") then this must cumulatively add up to a significant adverse effect. This biased judgement has arisen through the lack of an independent landscape consultant having input to the landscape assessment by PVDP as indicated by Mr Moggridge.	The potential impacts of the Project upon all Landscape and Visual Resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. The Landscape and Visual Impact Assessment has been carried in accordance with the methodology based best practice guidance as contained within the Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013) (GLVIA3) and Landscape Institute Technical Guidance Note 2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3). Based on guidance contained within these documents moderate effects can be either significant or not significant.. In accordance with this methodology, it is considered that an effect of moderate adverse is not significant. Were moderate adverse considered significant, this would. In our professional opinion, result in a disproportionate number of significant effects. There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology to support those judgements. The numbers of people using the public rights of way network within the 5 m study area varies, as does the context and visual characteristics of the view. It is not known how people use sections of a Public Right of Way, in which direction and when. Where no firm data are available a relative judgement is sufficient, as proposed in GLVIA3, Therefore, the position has been adopted of individuals using a public rights of way walking towards or
RR-0103-003		Part of the permanent changes to the landscape includes the enclosing of hundreds of kilometres of Public Rights of Way (PRoW) with 2.1m high fencing. For the residents of Bladon, the proposal will enclose all of the rights of way in the south of Bladon, which is approximately 5.8km of PRoW (refer to Annex C Map). It should be noted that these are the only public PRoWs available to Bladon residents as the village borders Blenheim Place land to the North and although there are permissive paths, which can be revoked at any time, there are no PRoWs. This enclosing will affect the amenity of the PRoWs by creating unattractive corridors that will deter not only local users but also those who would have visited the area to enjoy the countryside.	

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			through the Project, looking directly at the Project, even if wider views are available. Regarding valency, the position has been taken of that of a person who objects to the presence of the Project. The Landscape and Visual Impact Assessment has completed an assessment of the selected and agreed Representative Viewpoints and has acknowledged several significant effects because of the Project. The LVIA has also acknowledged that there would be a change in the effects experienced along sections the length of some public rights of way. Green lanes are characteristic of this part of Oxfordshire, e.g. PRoW 416/11/30 (Claude Duval Way). Landscapes are not 'preserved in aspic' they are dynamic and ever-changing. Areas within the wider landscape, around the Project are rapidly changing, with agricultural fields in certain areas that have been / are being planted as woodland, as part of the Blenheim Estate's wider vision for the area, or the establishment of the Salt Cross/Eynsham Vale garden village, to the north of the A40 and Eynsham, on agricultural land. Project Impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. Designed in mitigation including areas of woodland and lengths of hedgerow will, over time, maintain and enhance the natural connectivity with existing areas of planting and those which have been implemented by others. Such as extensive areas of woodland planting within Blenheim Palace Estate land.
RR-0413 (ICOMOS)	Landscape and Visual Effects on Blenheim Palace World Heritage Site	Preliminary Assessment of Impact on Blenheim's Rural Landscape, surrounding the WHS : ICOMOS-UK also has an interest in sustaining the quality of the rural landscape in the UK. The attractive countryside which would be affected by the three blocks of the proposed Botley West Solar Farm is sensitive to downgrading. The Northern and Central blocks are not far from Blenheim WHS, while the Central and Southern blocks are in the NW of Oxford's Green Belt. While it is understood that it is national policy to provide solar farms as a contribution to counteracting global warming, it is surprising that there appears to be little national policy as to how suitable sites should be selected, so that in the perceptive words of The Gardens Trust: the choice of energy sites is currently unplanned and opportunistic. ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee has asked one of its members, Hal Moggridge OBE VMH PPLI FIHort RIBA AADip, to assess the current proposals, an assessment endorsed by the committee, on an assumption that, in part at least, Botley West Solar Farm might be constructed. The assessment suggests that parts of the current proposals are unacceptable because they impinge too closely upon adjacent	The proposed solar farm has been carefully designed to ensure that no part of the development would be visible in any of the defined key views out of the Blenheim Palace WHS, or indeed from any location within the WHS. The design of the proposed solar farm also considered the visibility of the scheme when viewed by visitors approaching the Blenheim Palace World Heritage Site (WHS). Some fields directly adjacent to the approach routes were withdrawn from the scheme as a result. This is further described in the Applicant's assessment of likely impacts and effects in respect of the Blenheim Palace WHS which is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England. The Heritage Impact Assessment identified a likely 'minor negative' impact on one defined attribute (Attribute 7) which contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. This is Attribute 7, which states '<i>The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of</i>

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		villages, including the new Salt Cross village proposal. The proposals also appear to have ignored topography in a landscape with some significant escarpment and steep slopes, though river valleys have been respected.	<i>the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it'.</i> The overall assessment of likely impacts and effects on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4, [APP-141]). The impact would be time-limited and fully reversible. The sensitivity/value of the WHS is determined as 'very high', resulting in a likely effect of 'minor adverse' significance, which is not significant in EIA terms. The Applicant notes that in their Relevant Representation (RR-0398), Historic England does not disagree with the Applicant's assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4, [APP-141]), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment [CR1-003]. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS. The Applicant also notes that ICOMOS-UK has made a Relevant Representation in respect of the scheme [RR-0413]. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the OUV of the UK World Heritage Sites and their settings is one of their key objectives. ICOMOS-UK state that <i>'the proposed Botley West solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map 'Character of Setting of WHS' on page 50 of Appendix III of the Management Plan'</i>. (emphasis added)
RR-0134-010	Effects on Sports and Outdoor Activities	Not sure if relevant but adjacent playing field and footpath views will be ruined	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3]. People involved in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape are likely to be less sensitive to change/impacts in views. The nature of the groups of people who will be affected and the extent to which their attention is likely to be focussed on views and visual amenity has been considered within the LVIA. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public

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			rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays.
RR-02005-3	Impact on Health and Wellbeing	Similarly, even though the developer would be obliged to preserve the Public Rights of Way (PRoW) within and immediately adjacent to the power station, the amenity value of those rights of ways (which include a section of the Oxford Greenbelt Way) would be lost, as instead of walking across open fields with views of the surrounding hills, people would be walking along narrow canyons between high fences backed by solar arrays taller than any human (see also section 2.9).	The impacts of the Project upon potentially significantly affected landscape and visual Resources and receptors, within the 5 km Study Area, including public rights of way, have been assessed within the Landscape and Visual Impact Assessment [APP-045_6.3]. Within the LVIA, 55No Representative Viewpoints were selected and agreed with the host authorities. These included a number of views from public rights of way, including the Oxfordshire Way Recreational Route (Representative Viewpoint 9 and 10). There are no significant adverse effects identified from the Oxfordshire Way or other Recreational Routes. It is acknowledged that the Project would result in a number of significant adverse visual effects. Particularly from a number of public rights of way in proximity to or passing through the Project. When viewed on plan, the Projects' scale appears to be substantial. However, when viewed from the ground, as will be the case for residents and visitors in the area, because of the spread-out nature of the three separate Project sites, there will be no location from where the Project will be visible in its entirety. Rather, public rights of way users, for example, will have views to parts of it. The Landscape and Visual Impact Assessment [APP_6.3] has identified and acknowledged a number of significant effects upon visual amenity. Particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified. Designed mitigation, as shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228], includes supplementing existing vegetation and new planting including hedgerows, trees and woodland. This over time, along with substantial areas of existing new woodland planting, would break up the overall mass of the Project within views. Low-lying solar panels following the existing contours, along with gaps between rows and available views under the panels, would further dilute the absolute visual effects of the Project. Project Impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. Regarding the suitability of the proposed mitigation please see the response to RR-0103-003, above. For the effects on the public rights of way network, please see ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. The effects of the development upon mental wellbeing of residents is looked at within ES Chapter 16: Human Health [APP_053].
RR-0604-001	Impact on Open Spaces and Landscapes	(1) This is an important landscape for the recreation of those who live in the City of Oxford. We think that a development of this kind on prime agricultural and woodland areas which have high	The impact on agriculture and land use is assessed in ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054] .

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		amenity value including views in and views out should in principle be discouraged. The proposal if allowed will be detrimental to that amenity.	As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change. The potential impacts of the Project upon all Landscape and Visual Resources, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3]. Project Impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays.
RR-0761-016 Natural England	Landscape Character	The proposed development is not located within, or within the setting of, any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of this development. The examining authority should have regard for the landscape character of the area; we welcome the reference to Natural England's National Character Areas and other Local Landscape Character Assessments within ES Chapter 8 (Landscape and Visual Impact Assessment). We would also like to stress the importance of cumulative landscape impacts from the development.	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3]. The Landscape and Visual Impact Assessment [APP-045], includes and assessment of cumulative effects at section 8.11.
889	Loss of Countryside Character	The harms caused by the construction, maintenance and decommissioning will be profound and permanent on land much of which is designated as being of High Landscape Value.	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km Study Area for the assessment, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan [APP_062]. The environmental effects of the Project are considered reversible, unlike for those arising from residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed. The Landscape and Visual Impact Assessment [APP-045], includes an assessment of cumulative effects at section 8.11. The Parish of Cumnor, in common with other areas within which the Project, is located in a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation
RR-0339-3		Character of the area - The rural character of a wide area will be destroyed by the acres of unbroken panels and the associated paraphernalia of the transformer stations, fencing and lighting.	
RR-0376-9		The planned housing and industrial development at Salt Cross to the north of Eynsham and the solar panels to the east of Lower Road creates a highly industrialised and populated zone that is totally out of character with the rural setting of the area. The worst-case scenario would be for the Salt Cross development to be built without alternative energy provision with acres of land covered by solar panels at a short distance away.	
RR-1086-6 Vale of White Horse District Council		VWHDC considers the scheme will result in a significant change and harm to the open and rural landscape character, both within the wider setting and to the rural landscape setting of Cumnor Parish. There will be a loss of attractive views and a negative impact on views across and over the valley floor and to the rising land both to the north	

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RR-1102-12 West Oxfordshire District Council		towards Wytham and south towards Cumnor, from the recreational network of public rights of way (PRoW) in the area including the Oxford Greenbelt Way. There would also be a loss of tranquillity.	scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. The perceptual characteristic of tranquillity is considered in the LVIA. Thirty-three photomontages have been produced as part of the application [APP-072 to 080]. These demonstrate the impacts of the Project and illustrate that the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours. The existing public rights of way network would be retained and managed during the construction of the project in accordance with the outline Public Rights of Way Management plan [APP-232]. They would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. As such, the public's access would not be restricted. For more information on effect on the public rights of way network see ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the Project is proposed will similarly change. The proposed mitigation measures such as planting will reduce effects identified in the ES. The effect on wildlife is considered in ES Chapter 9 - Ecology and Nature Conservation [APP-046], outlining both negative and positive impacts to ecology receptors. The Applicant welcomes the acknowledgement in this relevant representation that significant steps have been taken to address the respondent's concerns, while noting that concerns still remain. The Landscape and Ecological Management Plan (LEMP) is outline only. A detailed LEMP is secured by requirement [APP-235] of the DCO and will be developed and agreed with all three local planning authorities. Separation between villages is a spatial planning matter and is considered in the Planning Supporting Statement (PSS) inc Green Belt Case [APP-225].
RR-0098-021		Impact on the ability of the public to enjoy the wildlife of these rural areas 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. We wrote the above in a previous response but stand by it and include it in this response. Having reviewed the documentation now provided we remain highly concerned on this matter. However, we do acknowledge that the applicant has taken some significant steps to address our concerns, and we have reviewed the useful set of diagrams on pages 54 – 65 of the Landscape and Ecology Management plan. We remain however significantly concerned on this matter and we consider that more work is needed.	
RR-0134-009		Setting - currently rural, will be partly surrounded by industrial Approach - again currently rural, will be industrial from some directions	
RR-0791-002		The introduction of such a large number of panels, as far as the eye can see, will fundamentally change local landscapes. We note the proposed retention of elements of existing hedgerow and important landscape features across the sites; the retention and improvement of existing access ways and public rights of way; the improvement of	

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		biodiversity across the sites as a whole; the measures taken to protect the setting of local heritage assets and conservation areas that could be potentially impacted by the proposals. We're not convinced, however, that the proposed level of landscape mitigation is sufficient for a scheme which will dramatically alter the local landscape character and views for more than a generation.	
RR-1007-026		It is noted that a significant proportion of the Site around Cassington, Bladon and Begbroke occupies Broad Area 13. In relation to this area, the Study found that: • The broad area pays a role in preventing the reduction in the physical and visual gap between Bladon, Begbroke and Kidlington; • The broad area is rural in character and contains many natural features including the ancient woodlands of Burleigh Wood, Blandon Heath and Begbroke Wood, as well as open agricultural fields with open views of the surrounding countryside; and • The broad area contributes to the setting and special character of Oxford as a historic city 3.2.6 The Project would significantly reduce the gap between Bladon and Begbroke as well as Bladon and Long Hanborough. The rural character and natural features which characterise this part of the Green Belt, as well as the open and exposed views of the surrounding countryside, would be significantly encroached upon by the Project and could also affect the character and setting of Oxford (which has not been considered at all within the Application material, as discussed in further detail below).	
RR-870-005	Project Size Concerns	5. Wytham Woods and Wychwood Forest. There are two significant omissions in the PVDP application relating to Wytham Woods and the Wychwood Forest: *Wytham Woods has been owned by the University of Oxford since 1942 and is often quoted as being one of the most researched pieces of woodland in the world, with their 1000 acres designated as a Site of Special Scientific Interest. *The location of the high voltage cable corridor near to Swinford (as shown in Vol 2 Fig 2.4D) is adjacent to Wytham Woods, the Oxford University research centre and SSSI (Site of Special Scientific Interest). Wytham Woods are not open to the general public without permission, but many Oxfordshire Ramblers have applied for access so that they can benefit from walking there and experiencing its valuable natural environment. We are concerned that there is nothing in the PVDP application to suggest that they have discussed with Oxford University the possibility of negative ecological impacts being caused by the construction work. We trust that this	The impacts of the Project upon landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the Landscape and Visual Impact Assessment [APP-045]. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The 55 Representative Viewpoints were consulted on and agreed with all host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative

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		omission will be rectified. *Wychwood Forest is not mentioned in the application. The Botley West Solar Farm would have a specific negative impact on this designated area. Wychwood Walk No.9 (a 7-mile circular route from Woodstock to Wootton) passes through the "Northern site" of the project. Solar panels are at first on both sides of a section of the Oxfordshire Way (it follows the route of the Roman Akeman Street). The route then continues east before turning north – solar panels continue to be alongside.	Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045] . Wytham Woods is a privately owned woodland, with access by appointment. As such, there is no general public access. Although the Project will be partly visible in views from more open parts of the woodland and at the edge of it, no significant effects have been identified from Representative Viewpoints within or at the edge of Wytham Woods. Including Representative Viewpoints 42, 43 and 44. A photomontage (winter and summer) was completed to illustrate possible effects from Representative Viewpoint 42.
RR-0339-1		Scale – It is hard for local people to understand the sheer scale of the development, and Freeland Parish Council is concerned that the information provided to illustrate that scale is totally inadequate. The number of viewpoints considered (55) is too small to be representative of the visual impact of 900ha of panels on the surrounding area, a point that is raised by Oxfordshire County Council and other statutory consultees. Of these, only 33 have so far been made into photomontages to help the public visualise the true effect.	The Landscape and Visual Impact Assessment [APP-045] has identified significant effects upon visual amenity, particularly from Public Rights of Way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP-045] , at a very local level or where it would not be possible to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape.
RR-0339-2		Visual impact and topography of the area – allied to the scale, the fact that the area is undulating land along the Glyme, Dorn and Evenlode valleys, the visual impact of so many panels on valley sides and rising ground will be much greater and significant over a wider area than if the ground was level.	The solar PV arrays have a maximum height of 2.3m and follow the natural contours of the local landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located. The ecological effects of the proposed solar farm on Wytham Woods SSSI and Wychwood are assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046] . The effect on the setting of Oxford as a historic asset is assessed in ES Chapter 7 - Historic Environment [APP-044] .
RR-1102-13 West Oxfordshire District Council		Further consideration of the constraints and opportunities and site topography in relation to the project area, should guide further revisions to the design and layout of the proposed development. Such revisions could result in a reduced scale of project, but would help to minimise the magnitude and significance of effects on a sensitive environment and leave a positive landscape and ecological legacy beyond the lifetime of the development.	Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that <i>"infrastructure to achieve our energy objectives national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation"</i> (NPS EN-1, paragraph 3.3.63). The NPS explains further that <i>"projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero"</i> (NPS EN-1, paragraph 4.1.7). The residual landscape and visual effects, after the proposed mitigation do not present an unacceptable risk to the matters listed.
RR-0793-005 Oxfordshire County Council		Landscape Impacts The development will replace large areas of agricultural land with solar development. By reason of its nature, mass and scale, the proposed development will alter the landscape character at a large scale affecting the current openness, tranquillity and agricultural character. It will also significantly affect visual amenity, with effects on the PRoW network and nearby residential areas being of particular concern.	NPS EN-3 explains that <i>"Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation of the site"</i> (NPS EN-3, paragraph 2.10.42). The physical detailed effects on the public rights of way network are considered in ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054] .

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		The development as proposed is not supported in landscape and visual terms. Further information and revisions are required to address concerns in relation to the LVIA, layout and design (including design evolution, scale, extent, siting), mitigation, impacts on vegetation and ongoing management to reduce the impact of the proposal. The DCO application proposes a standard minimum buffer of 25m to adjacent residential areas (i.e. an increase by 5m from the PEIR), however, this distance does not appear to be informed by any assessment work, and the justification for this approach is not clear. We believe that the distance and treatment of buffers should be determined on a site-by-site basis and informed by assessment work. Adverse effects on heritage areas and their setting are also a concern.	NPS EN-3 encourages Applicants to " <i>minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape</i> " (NPS EN-3, paragraph 2.10.43). It also requires Applicants to " <i>consider and maximise opportunities to facilitate enhancements to the public rights of way and the adoption of new public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights or the creation of permissive paths)</i> " (NPS EN-3, paragraph 2.10.44). As detailed above, NPS EN-3 encourages Applicants to minimise the visual impacts of developments. This has been achieved through the production of the Illustrative Landscape Masterplan [APP-062] . This has considered and minimised landscape and visual impacts as set out in NPS EN-3. Areas from where views of the Project would theoretically be possible were determined by means of the ZTV analysis. Selected visual receptors located within the ZTV, likely to experience visual change were identified through field work, and their sensitivity established in accordance with best practice guidance, as set out in the LVIA methodology. The ZTV is based on the development of solar panel heights up to 2.3 m high; PCS heights of 3.5 m; NGET substation height of 12.5 m; main Project substation height of 11 m and secondary Project substation height of 6 m. The ZTV is based on a viewer height of 2 m. Where these different elements are visible from individual Representative Viewpoints, these elements have been considered as part of the assessment of effects.
RR-0626-003		The proposed development is for one of the largest arrays in the world and the only one that impacts multiple rural villages and lies adjacent to internationally significant sites of special scientific interest.	
RR-0789-003		Concern about the size of the footprint of the proposed principal substation which we understand is 5 acres	
RR-1007-002		There would be significant and extensive impacts upon the landscape character of the area and to visual amenity given the Project's design and scale. The project design and scale has not considered the necessary mitigation;	
61	Urbanisation of Rural Landscape	The overhead cable would clinch this oppressively industrialised effect.	Relevant Representation 61 is referring to an overhead cable. It is not clear what this is specifically referring to. All cable routes throughout the Project will be below ground. Limited above ground cabling would be evident at the point of connection as part of the substation development.
RR-0339-5		Public rights of Way – residents of Freeland frequently use many of the footpaths to be subsumed by panels and are concerned that the experience of walking through the countryside will be replaced by having to follow narrow paths through an industrialised landscape.	The potential impacts of the Project upon all landscape and visual receptors, within the 5 km Study Area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment (LVIA) [APP-045] .
RR-1007-022		It is, therefore, evident that the industrialisation of the undulating river valley landscape would result in severe, long term, adverse visual impacts, particularly during winter months, upon local residents and others walking, cycling, horse riding and cycling on the network of footpaths, bridleways and local roads which traverse the area, many of which would have open overviews of the solar panels. Again, this aspect does not appear to have been considered in terms of formulating the scheme design and the mitigation measures.	Project impacts will be minimised by mitigation measures. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228] . Existing public rights of way will have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays through screening. The solar PV arrays will be low in height, at a maximum height of 2.3m, and follow the natural contours of the local landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located. The LVIA [APP-045] has identified significant effects upon visual amenity, particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would not have significant effects beyond those

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			identified, within the LVIA [APP-045] , at a very local level or where it would be difficult to entirely mitigate visual effects (not a requirement of this CNP infrastructure project). In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape.
RR-870-006	Visual and Environmental Intrusion	6. Summary. Oxfordshire Ramblers is very concerned that due to the size of the proposed solar farm there will be major adverse visual impact to users of some of the PRoWs throughout the period of the project i.e. for decades to come. We estimate that around sixty PRoWs cross the proposed solar farm with a total length of 28 km. We therefore object to the application because we consider that the negative visual impact and associated adverse health effects outweigh the benefits of the project.	The potential impacts of the Project upon landscape and visual receptors, within the 5 km Study Area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment (LVIA) [APP-045]. The LVIA methodology is set out in ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]. Possible landscape and visual effects of the Project were assessed by considering the magnitude of impact, when compared with the existing (baseline) conditions, likely to be experienced by landscape resources and receptors and visual receptors (people), as a result of the construction and operation of the Project. Magnitude of impact was combined with the sensitivity of the receptor to arrive at a judgement of the level of effect (Significance of Effect). The sensitivity of landscape receptors and visual receptors is assessed by considering both its inherent value and its susceptibility to the type of development proposed. A judgement is then made as to whether the predicted landscape or visual effect is likely to be significant or not. The methodology for the assessment of the Project is based on the Guidelines for LVIA (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) which recommends that an LVIA “concentrates on principles and process” and “does not provide a detailed or formulaic recipe” to assess effects, it being the “responsibility of the professional to ensure that the approach and methodology are appropriate to the task in hand” (preface to GLVIA3, page x). GLVIA3 is the best practice guidance for LVIA. When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. Paragraph 3.32 of GLVIA3 explains that there are no hard or fast rules about what effects should be deemed to be significant. The assessment within Chapter 8: Landscape and Visual Impact Assessment [APP-045] are influenced by the proportionality principle expressed in paragraph 1.17 of GLVIA3 “<i>identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that assessment should be tailored to the particular circumstances in each case.</i>” For the purposes of the Project, those effects of Moderate adverse or below are considered to be not significant. Taking the proportionality approach to the assessment, it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors.
RR-0102-004		Part of the permanent changes to the landscape includes the enclosing of hundreds of kilometres of Public Rights of Way (PRoW) with 2.1m high fencing. For the residents of Bladon, the proposal will enclose all of the rights of way in the south of Bladon, which is approximately 5.8km of PRoW (refer to Annex C Map). It should be noted that these are the only public PRoWs available to Bladon residents as the village borders Blenheim Place land to the North and although there are permissive paths, which can be revoked at any time, there are no PRoWs. This enclosing will affect the amenity of the PRoWs by creating unattractive corridors that will deter not only local users but also those who would have visited the area to enjoy the countryside. The enclosing of the PRoWs will also prevent the free roaming of the wildlife in the area and may cause conflict between users, including those with dogs, and the larger wild animals in the area. The enclosing of all Public Rights of Way (PRoW) accessible to Bladon residents, along with the impact of the proposal on the recreation ground's amenity, will result in residents having no access to open space unaffected by the solar farm infrastructure.	
RR-0102-011		It is proposed that fencing will be erected adjacent to all existing and proposed PRoWs within the development. This fencing will create a corridor effect along the PRoWs. It is not possible from the information provided to see how wide the PRoWs will be and thus the width of the corridors. BPC is concerned that due to Oxfordshire County Council's	It is the Applicant's current position that the methodology used to assess the landscape and visual effects, of the Project follows best practice guidance. The judgements made in the LVIA are clear, transparent and proportionate to the Project.

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		on-line definitive map not having a record of the widths of many of the PRowWs that are identified in the proposal that only the minimal legal requirement for PRowWs will be used. These are currently: - •Footpaths Cross-field/other 1m • Footpaths Field-edge 1.5m • Bridleways Cross-field/other 2m • Bridleways Field-edge 3m The creation of narrow corridors with 2.1m fencing either side will impact both the users of the network and the wildlife in the area. There are hundreds of kilometres of PRowWs throughout the development. There is over 5.8km of PRowWs in the development area behind Bladon Village between Bladon Heath and the A44. This 5.8km represents all of the PRowWs available and easily accessible by Bladon residents. Of the 5.8km of PRowW, all but approximately 840m will be surrounded on both sides by solar panels and 2.1m fencing. The remaining 840m will have solar panels and fencing one side. This means that users of the PRowWs around Bladon will have not any PRowWs available to them that are not surrounded by a continuous view of solar panels and fencing. The only other option for recreational walking is within the grounds of Blenheim Palace. BPC request that development in the proximity of the PRowWs is avoided and that if this is not possible then the width of the PRowWs should include a considerable sized buffer so that amenity of the PRowWs can be preserved.	Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The LVIA [APP_6.3] has identified and acknowledged a number of significant effects upon visual amenity particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP_6.3], at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape. A minimum of 5m width has been allowed for public rights of way between hedge boundaries. In many locations this has been significantly increased, as shown in Figure 7.6.3.2 of the oLEMP [APP-235]. Additionally, new permissive footpath and cycle path routes would be created. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. For example, between Bladon and Campsfield. The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045]. Where possible, viewpoint locations were selected based on published important views, such as those identified in the Cumnor Parish Neighbourhood Plan Important Views Report (February 2021). As stated above, all viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects. No existing mature hedgerows and trees would be removed as a result of the Project, including those along the Claud Duval Right of Way National Cycle Route. Only small sections of hedgerow would require removal to accommodate certain aspects of the Project, such as access and highway visibility. Hedgerow to be removed is illustrated on the Hedgerow Removal Plans [APP-013]. Reversibility is a factor to be considered when evaluating the magnitude of impact of a proposed development (GLVIA3, paragraph 6.39). <i>“Reversibility is a judgement about the prospects and the practicality of the particular effect being reversed in, for example, a generation. This can be a</i>
RR-0135-2		he LVIA has taken an approach of identifying specific footpaths and then using photographs from specific viewpoints to assess the impact of the proposal through both construction and operational phases. We note that of 55 recommended Viewpoints only 31 have been completed (mentioned in numerous places in Volume 1, Chapter 8 of the ES). It would seem that the Cassington Neighbourhood Plan was not examined in detail as several important footpaths used by our residents were not included. Specifically, footpath 152/8/10 was not included, a Public Right of Way which will be severely impacted by this proposal because not only will it be surrounded by solar panels through part of its length but also the distant views of the hill on which Purwell Farm is located and through to the Evenlode Valley will be transformed by solar panels. This footpath is used for leisure purposes and provides a local route for movement by foot or bicycle between Cassington, Begbroke and Yarnton. The most heavily used footpath from	

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		Cassington is 152/6/10, known locally as The Track. This is covered by View Points 37a,b, 38, 39. During the construction phase it is concluded that impacts on Public Rights of Way will not be significant (ES Vol. 1 Chap. 8 Para 8.9.28). Footpath 152/6 /10 has open views in places looking south all the way across to Cassington Village, Wytham Woods and Oxford City itself. These are not short views but in fact cover distances of ~5km or more. Furthermore, this footpath will be adjacent to the proposed development on either side. We point out that landscape is not just visual but also includes the soundscape which presents a rural environment of tranquillity and natural sounds. Both the visual presence of construction equipment, workers and the activities of pile-driving and construction will undoubtedly result in highly significant adverse impacts. The conclusion of the ES (Vol. 1, Chap 8) is simply not credible (see also descriptions of Viewpoints 8.9.80 – 8.9.83). Likewise for the Operational Phase of the Botley West Solar Power Station an almost identical statement is made in ES Vol. 1 Chap. 8 Para. 8.9.125 and 8.9.126. This is corroborated by examination of the individual footpaths, again, most notably The Track (footpath 152/6/10) in Paras. 8.9.223 to 8.9.226. These paragraphs are contradictory as 8.9.125 states that impacts would only be “moderate” when, as can be seen from 8.9.223 and 8.9.225 they are potentially “major”. Secondly, in both cases it is claimed that mitigation in the form of planting will reduce impacts to minor or moderate adverse. We find it highly doubtful that this will reduce the visual impact of the development but also, that the mitigation proposed, the planting of hedging along PRow 152/6/10 will significantly restrict the currently open views of the countryside from the footpath. Whether or not such mitigation is effective at hiding the solar panels is irrelevant if the view of the surrounding countryside is destroyed. Again, we do not find the assessment of impacts, especially at 15 years, credible or the proposed mitigation. These criticisms extend to other Public Rights of way used by our parishioners including footpath 206/11 (Eynsham Mill) and 238/5 (to Church Hanborough) as well as others in the local area. 1.4 Views from the Surrounding Road Network Central Site Considering 8.9.37 to 8.9.40 we point out that at present, local road users and transient road users enjoy a largely rural aspect whilst using the parts of the A40, A44, A4095 and Cassington (known locally as the Burleigh Road) and the Low Road. This adds to the overall feeling of a rural environment valued by our residents and why this part of Oxfordshire is seen	<i>very important issue – for example, while some forms of development, like housing, can be considered permanent, others, such as wind energy developments, are often argued to be reversible since they have a limited life and could eventually be removed and/or the land reinstated.</i> <i>Duration and reversibility can sometimes usefully be considered together, so that a temporary or partially reversible effect is linked to definition of how long that effect will last.” (GLVIA3, paragraph 5.52)</i>

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		as desirable as a place to live. As with the analysis of footpaths / landscape we find this assessment of visual impacts from these roads underestimated.	
RR-1108-5		Part of the permanent changes to the landscape includes the enclosing of hundreds of kilometres of Public Rights of Way (PRoW) with 2.1m high fencing. This enclosing will affect the amenity of the PRoWs by creating unattractive corridors that will deter not only local users but also those who would have visited the area to enjoy the countryside. The enclosing of the PRoWs will also prevent the free roaming of the wildlife in the area and may cause conflict between users, including those with dogs, and the larger wild animals in the area. Rights of Way and Fencing 1.1 It is proposed that fencing totalling over 180km will be erected adjacent to all existing and proposed PRoWs within the development. This fencing will create a corridor effect along the PRoWs. 1.2 None of visualisation's provided show how a PRoW enclosed on either side by a 2.1m fence and fields of panels will create a continuous corridor effect for the users of the footpath. 1.3 It is also not possible to identify the location of the proposed fencing. It is not clear if the fencing is around individual fields or groups of fields. 1.4 There are hundreds of kilometres of PRoWs throughout the development including Samson's Way which runs from Woodstock to the North. This route is approximately 8km long and over 7km will have fencing and panels on either one or both sides. 1.5 Although the Oxfordshire Way may not be enclosed the views from the PRoW will be severely affected due to the immense expanse of solar panels that will be visible from the PRoW. 1.6 It is not possible from the information provided to see how wide the PRoWs will be and thus the width of the corridors. WTC is concerned that due to Oxfordshire County Council's on-line definitive map not having a record of the widths of many of the PRoWs that are identified in the proposal that only the minimal legal requirement for PRoWs will be used. These are currently: - • Footpaths Cross-field/other 1m • Footpaths Field-edge 1.5m • Bridleways Cross-field/other 2m • Bridleways Field-edge 3m 1.7 The creation of narrow corridors with 2.1m fencing either side will impact both the users of the network and the wildlife in the area. There is an increase risk of conflict between the PRoWs users, including those with dogs, and the larger wildlife that may be present on the PRoWs. 1.8 There are concerns about personal safety when walking along the corridors that will be created by the high and continuous fencing. 1.9 The amenity of the PRoWs	

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		network will be impacted and the creation of corridors will make the footpaths no longer attractive for recreational purposes for both local users and those visiting the area. This loss of amenity will have a negative impact on health, wellbeing and tourism. 1.10 WTC feels that development in the proximity of the PROWs should be avoid and that if this is not possible then the width of the PROWs should include a considerable size buffer so that amenity of the PROWs can be preserved.	
RR-1109-2		If the Planning Inspectorate is minded to accept the need for Solar generating capacity, despite the arguments against that provision in this location, then the WPC would want to see changes to the following in respect of the Northern Site:2. No existing hedgerows, mature trees or dry stone walls along the boundaries of the site or on either side of the Dornford Lane (Claud Duval Right of Way National Cycle Route) or any PROW to be removed. Where it is essential to allow access and hedgerow removal is specified on the current maps provided to the Planning Inspectorate, the disturbance must be minimised and planting replaced and removal can be only in the specified locations. 3. A number of footpaths and PROWs cross the Northern Site. Some of these will have temporary access routes along or across them during construction. The developer must agree (by use of conditions on planning approval if granted) to restore these, and to provide suitable screening on all footpaths some of which will have been less used, and consequently become overgrown or in poor repair, during the construction. These footpaths, bridleways and cycle routes are an essential part of recreation and wellbeing facilities for the surrounding population and many represent ancient routes of travel. These must not be lost.	
RR-1086-9 Vale of White Horse District Council		VWHDC also have concerns to how the project, regarded as fully reversible, is being applied to the assessment of effects. i.e. 8.9.119 "The magnitude of impact, for those parts of the PROW where views are available, would be Medium, resulting in a Moderate adverse significance of effect. Considering users' High sensitivity, reversibility of the solar farm and proposed mitigation, albeit not yet having matured and reached its' intended design function. This effect is not significant." High sensitivity, medium impact would give a Moderate to Major]adverse significance, which is significant under EIA assessment, this significance should not be reduced because the solar farm is stated as being reversible.	

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RR-0098-022		Whilst the proposal for existing footpaths and new footpaths to have “greenway” style design with minimum path widths, and a minimum distance between the deer fencing and the path, and the inclusion of hedgerows, trees and interpretation boards is a step in the right direction there remain some serious concerns:	
RR-1007-021		The LVIA identifies a proliferation of public rights of way throughout the northern, central and southern sites, whilst the assessment states that: “The sensitivity of the people using the local PRoW network for informal recreation is considered to be High because appreciation of the surrounding environment is a primary concern.	
RR-0793-012 (Oxfordshire County Council)	Visual Disruption The entire Parish is within the 2km Community Consultation Zone and within the Zone of Theoretical Visibility.	Landscape & Visual / Green Infrastructure 1.1 In our response (February 2024) to the Preliminary Environmental Information Report (PEIR) (“the PEIR response”) we set out a number of concerns relating to the landscape and visual impact of the development. These included: 1.1.1. Project description - insufficient information on a number of aspects relating to construction (including cabling), operation and decommissioning; 1.1.2. Landscape and Visual Impact Assessment (LVIA) – concerns relating to methodology including level of significance, magnitude of impacts, viewpoints (number, direction of view), Zone of Theoretical Visibility (ZTV), visualisations/photomontages; concerns about the assessment on residential receptors and conservation areas; 1.1.3. Mitigation – use of a standard 20m buffer, scale of mitigation, lack of a landscape-scale approach, effects on Public Rights of Way (PRoW); 1.1.4. Arboricultural impact – concerns about impacts on characteristic vegetation; 1.1.5. Management – need for long-term management; 1.1.6. Cumulative effects – concerns about cumulative impacts with strategic allocations and other developments; and 1.1.7. Green Belt – impact on the Green Belt to consider. 1.2 The PEIR response remains relevant and is reproduced at Annex 2. Comments in this section focus on the information presented in the DCO application and highlight key areas of concern in	The potential impacts of the Project upon all landscape and visual receptors, within the 5 km Study Area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment (LVIA)[APP-045]. The Landscape and Visual Impact Assessment [APP-045] has identified and acknowledged a number of significant effects upon visual amenity. Particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP-045], at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured. Due to the undulating nature of the topography in the local area it would not be possible to entirely screen the Project. However, there would be no location on the public right of way network where the whole Project would be visible. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape. The Study Area for the assessment of landscape and visual effects in the ES chapter (‘the Landscape and Visual Study Area’) has been informed by the design of the Project, incorporating up to 2.3 m high solar arrays, power converter station locations, project substation location and the cable route corridor. The Study Area has also been developed in consultation with relevant stakeholders.

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		relation to the impact of the development on landscape character and views. 1.3 It should be noted that the OCC is currently in the process of jointly commissioning landscape/heritage consultants with the other host authorities (West Oxfordshire, Cherwell and the Vale of White Horse) to advise on the DCO application. The Council therefore anticipates to provide further detail relating to landscape, visual and heritage matters as part of the Local Impact Report (LIR).	The assessment considers the findings of analysis of the Zone of Theoretical Visibility (ZTV) of the solar farm assets (including any construction working areas) and the identification of Representative Viewpoints. Once the location of the assets were identified, and the ZTV produced, Representative Viewpoints were agreed with relevant stakeholders, including Local Authorities. The maximum 2.3 m high solar arrays of the Project, and dimensions of converter stations and project substation, form the basis of the landscape and visual resources Study Area. The extent of the Study Area has been determined by the findings of the ZTV and refined where necessary. Considering the assets of the Project, the Study Area extends to a 5 km buffer from the outer edges of the Project Site in all directions.
RR-0793-013 (Oxfordshire County Council)		General comments: 1.1.1. There has been very limited engagement on landscape and visual issues throughout the pre-application process. 1.1.2. The submitted information is not easily accessible. The application consists of many documents and requires a lot of cross-referencing making it difficult to locate all relevant information. Certain information is not presented in a user-friendly way, e.g. the viewpoints are shown on a separate high-level plan rather than being marked on the masterplan. Similarly detail relating to existing and proposed landscape treatment is provided on two separate sets of plans. 1.1.3. It is unclear how previous consultation responses have been taken into account in the design and assessment of the development. 1.1.4. Overall, much of the submitted information is high-level and general in nature 1.1.5. No issues relating to landscape and visual matter have been agreed to date. 1.1.6. OCC would encourage the Applicant to work closely with it to address these matters of concern before and during the Examination.	Areas from where views of the Project would theoretically be possible were determined by means of the ZTV analysis. Selected visual receptors located within the ZTV, likely to experience visual change were identified through field work, and their sensitivity established in accordance with best practice guidance, as set out in the LVIA methodology. The ZTV is based on the development of solar panel heights up to 2.3 m high; PCS heights of 3.5 m; NGET substation height of 12.5 m; main Project substation height of 11 m and secondary Project substation height of 6 m. The ZTV is based on a viewer height of 2 m. The ZTV shown on figure 8.7, 8.8, 8.9, 8.10 and 8.11 [APP-082 to 085] has been developed based on visual barriers for significant blocks of woodland, at a height of 12 m, and existing settlement, at an indicative height of 9 m. However, the ZTV does not account for visual barriers such as garden vegetation, hedgerows or individual trees. Therefore, the potential intervisibility with the Project would be less in places. This has been tested through fieldwork. Resulting in Representative Viewpoints being relocated or discounted. Representative Viewpoints, included and discounted as part of the consultation process are detailed within the LVIA [APP-045]. The ZTV shown on Figure 8.8a [APP-084] shows a 'bare earth' scenario, with only existing settlement barriers and local topography (i.e. no woodland). The ZTV, (Figure 8.7, 8.8, 8.8a, 8.9, 8.10 and 8.11) [APP-082 to 085] indicates that the ZTV for all fields within the northern, central and southern site generally follows the principal development areas of the Project Site, with potential highest visibility confined to within 3 km of the Project Site boundary. The ZTV takes into consideration significant blocks of woodland and built form but does not consider the screening effect of all vegetation. While the ZTV is a good representation of what might be seen, as it does not take account of smaller blocks of woodland, hedgerows, individual tree cover or garden vegetation, which add to the amount of screening provided by existing vegetation; the ZTV is therefore a worst-case scenario of theoretical visibility. The ZTV is based on the built elements of the Botley West Solar Farm, as set out in Chapter 6: Project Description [APP-043] and detailed within the Maximum Design Scenario for the LVIA at Table 8.19 of the LVIA [APP-045]. The onshore ZTV is based on the tallest buildings of the Mona Onshore substation. The ZTVs have been generated using best practice guidance.
RR-0793-014 (Oxfordshire County Council)		Landscape and Visual Impact Assessment (LVIA) 1.4 The LVIA [APP-045] does not consider the development to cause significant effects on the landscape character. With regard to visual effects, it considers 12 viewpoints to be significantly affected by year 1, with no significant effects anticipated by year 15 on the basis that mitigation planting will have sufficiently matured. 1.5 We have raised concerns with regard to the methodology, number of viewpoints and the assessment in our PEIR response. Notwithstanding that the landscape consultants will provide further advice on detail and adequacy of the LVIA and photomontages, an initial review of the information	

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RR-0793-015 (Oxfordshire County Council)		suggests that previous concerns with regard to the LVIA still apply. We consider the ES underestimates the impact of the development on landscape character and views. Development and design 1.6 Further information on the project elements and design have been provided (Chapter 6 Project Description [APP-043]) but questions with regard to appearance, design and impact remain. The following paragraphs provide some examples: 1.6.1 Information on cable laying methods (appendix 6.2: cable laying methodology and indicative HDD crossing locations [APP-130]) has been provided. The use of horizontal directional drilling (HDD) is welcomed to reduce visual effects, but its impact is insufficiently clear. Limited information has been provided about the two compounds on either end of the drilling hole and we are concerned that these could adversely affect local character and views, for example through the loss of mature vegetation. The entrance and exit hole compounds are shown on the plan but with the burial depth varying between 1.5m to 30m (para 6.3.11) it is not clear how the location of the compound has been determined at this stage. It is also unclear whether any ancillary structures such as cabinets or fencing will remain after construction. 1.6.2 The LVIA [APP-045] does not include any viewpoints in areas where cabling is proposed on the basis that effects are limited to the construction phase, however, with the level of impact and duration not being clear, we suggest that assessments from selected viewpoints are included to demonstrate the level of impact of these measures, e.g. a view from the Thames Path near Swinford Bridge.	The Applicant believes that the ZTVs are accurate, clear and proportionate, as are the judgements made using them, e.g. agreed Representative Viewpoint locations. Mitigation - Regarding the 25m buffer between residential properties and the Project, this was reached using a professional judgement. As part of the iterative design process, individual properties were look at in terms of their proximity, primary direction of view and any existing vegetation that would mitigate potential effects. Where additional mitigation was required, such as hedgerows, this was added as shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. The removal of panels and / or increased buffer distance was required in the case of Purwell Farm and fields to the east of Lower Road. Another example was the rising land just south of the Oxford School of Drama where a woodland belt has been suggested to ensure views across and up the hill would be broken by planting up views of the panels. Panels were also moved back south of Bladon, as well as additional tree planting to mitigate views from the edge of the village including the recreational ground. Project Impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. The LVIA [APP-045] has identified and acknowledged a number of significant effects upon visual amenity, particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified within the LVIA [APP-045], at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape. With regard to the reference to the location of the Project, the Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Project [APP-225]. At Appendix 8 to the PSS is the Very Special Circumstances case in respect of that part of the Project that falls within the Oxfordshire Green Belt.
RR-0793-016 (Oxfordshire County Council)		1.6.3 The development seeks to connect to the grid, which requires additional infrastructure including an additional substation that is not part of this application. It is essential that the impacts of all elements related to this development are assessed comprehensively to understand the landscape and visual impact of the development on the area. Given the grid connection is essential for the proposals, the DCO should restrict development until permission has been granted for the additional substation. 1.6.4 Four main temporary construction compounds are being proposed across the area. The appearance of the compound areas is not	Issues of visual intrusion, use of agricultural land, and amenity can be found in the ES at Chapter 8, Chapter 17 and Chapter 16 respectively [APP-6.3]. LVIA methodology – Level of significance- The methodology for the assessment of the Project is based on the Guidelines for LVIA (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) which recommends that an LVIA “concentrates on principles and process” and “does not provide a detailed or formulaic recipe” to assess effects, it being the “responsibility of the professional to ensure that the approach and methodology are appropriate to the task in hand” (preface to GLVIA3, page x). GLVIA3 is the best practice guidance for LVIA. When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. Paragraph 3.32 of GLVIA3 explains that there are no hard or fast

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		explained in detail, but they are large (approximately 100x100m and 100x200m) and will comprise structures and material storage secured by fencing, lighting and CCTV. The project description states (para 6.3.4) that these compounds are proposed to remain in place after construction albeit being taken over by solar panels. It is therefore important to understand their appearance and related impacts. This is particularly relevant as the Temporary Facilities Plans [APP-229] suggest that the majority of these will be placed in highly visible locations. The southern compound appears to be sited on a slope and thus is likely to require levelling of the land, which in turn is likely to increase its impact on landscape character and views. It is unclear whether and how this has been fully assessed in the LVIA and how the findings have informed the siting and design of the compounds. Further detail on the siting and design of each of the compounds should be provided. 1.6.5 Further information should be provided on decommissioning, i.e. what exactly it will entail and whether mitigation planting and land use changes introduced as part of the development will remain in place to deliver long term landscape benefits. This request is consistent with the National Policy Statement for Renewable Energy Infrastructure (EN-3), which states: "Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation."(para 2.10.69)	rules about what effects should be deemed to be significant. The assessment within Chapter 8: Landscape and Visual Impact Assessment [APP-045] are influenced by the proportionality principle expressed in paragraph 1.17 of GLVIA3 <i>"identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that assessment should be tailored to the particular circumstances in each case."</i> For the purposes of the Project, those effects of Moderate adverse or below are considered to be not significant. Taking the proportionality approach to the assessment, it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors. Solar farms are generally consented on the basis that they will be time-limited in their operation – and are not, therefore, permanent. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any Project. The proposed length of the permission, which for Botley West is 42 years from commencement to de-commissioning and removal, is not proposed to be permanent, and the lifetime of the Botley West Project is entirely in line with other similar solar farm projects of this scale and type, and which have been consented under the NSIP regime. The Project, as assessed in the EIA process and described in the Environmental Statement, takes this period into account. The effects of the Project on the setting of the Blenheim Estate ICOMOS World Heritage Site and the City of Oxford as historic assets have been assessed within ES Chapter 7 - Historic Environment [APP-044]. The separation between villages and other built-up areas is a spatial planning matter and is considered in the PSS including Green Belt Case [APP-225]. The effect of the Project on potentially significantly affected landscape and visual resources and receptors are assessed in section 8.9 of the LVIA [APP-045]. The Applicant has adapted the extent of the solar farm and increased distances from potentially sensitive receptors. The Applicant has also increased the amount of landscape mitigation, thereby minimising adverse effects on landscape and visual receptors, in line with the guidance in National Policy Statement EN-1 and EN-3 (see response to RR-870-005 and 0793-005, above). Hedgerows have been proposed as part of the landscape mitigation proposals, as shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. These will be managed to a height of 3m to 4m, as specified in the outline LEMP. Existing hedgerows will be reinforced and managed to a height of 3m to 4m. This will be sufficient for close views to be screened. More distant views on rising land will be available and this is acknowledged in the LVIA.
RR-0793-017 (Oxfordshire County Council)		1.6.6 The Overarching National Policy Statement for Energy (EN-1) states: "Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate." (Para 5.10.6).	

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		It further requires applicants to demonstrate in their application documents "... how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected."(Para 4.7.7). 1.6.7 It is unclear how findings in the ES including the LVIA have informed the siting, scale and design of the project as required by EN-1. Chapter 5 (alternatives considered [APP-042]) seems to suggest that the site location was primarily chosen on the basis of land availability (willing landowners) and availability of a grid connection. Whilst the importance of these factors is understood, it is not clear how environmental factors have informed the layout and design, e.g. how considerations relating to landscape character, views, ecology surveys, heritage, historic landscape character and agricultural land classifications have been taken into account. The only environmental issues that appear to have been included are designated sites and archaeological areas.	There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology within the Landscape and Visual Impact Assessment [APP-045] to support those judgements. All the landscape consultants that have worked/are working on the project are Chartered Members of the Landscape Institute and experienced in the assessment of solar farms within this type of landscape.
RR-0793-019 (Oxfordshire County Council)		Mitigation 1.10 Mitigation measures are listed in the LVIA [APP-045] (table 8.20), the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP228]. Mitigation comprises hedgerow reinforcement and planting, meadow grasslands, planting of individual trees and of woodland blocks. There are no obvious differences in the layout of the development between the Illustrative Masterplan in the PEIR and the Illustrative Masterplan submitted with the application [APP-062] except the addition of the archaeological areas. 1.11 The LVIA [APP-045] does not explain how information from the local landscape character assessments apply to the site, and it is therefore not clear how mitigation measures have been chosen for each location. Whilst many of the suggested measures are appropriate in general terms, it is important that the right measure is chosen for the right place to ensure that mitigation is in keeping with the local character. In some places the proposed planting of trees or hedgerows can adversely affect landscape character and views. For example, the photomontage for representative viewpoint 54 [APP-080] shows how the proposed planting will	

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		fundamentally change the character of the view from open to enclosed, adversely affecting the experience of the PRoW users. Mitigation in other locations is likely to have a similar effect on the landscape and PRoW users. 1.12 The effects on PRoWs are of particular concern as they are an important recreational resource for existing and future residents from within and outside the area. 1.13 EN-3 states in para 2.10.43: "Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape." 1.14 The development will by its scale and nature adversely affect the experience of public rights of way users travelling through the area. In many locations PRoW users will either travel through large areas of solar infrastructure or walk through corridors of hedgerows or tree belts with no or limited views of the surrounding landscape. 1.15 We raised a number of concerns in relation to the visual assessments in our PEIR response, and these comments still apply (see Annex 2 of this response). We consider the LVIA underestimates the impacts on several PRoWs, partly because it insufficiently recognises the length of PRoWs affected, and by overestimating the effectiveness of mitigation planting. 1.16 Other measures should be considered. For example, impacts on PRoW users could be reduced in several locations if smaller areas of solar were to be removed from the scheme so that they are limited to one side of the PRoW, e.g. near viewpoints 8, 16, 21-23, 33, 51 (see Representative Viewpoint and Photomontage Locations plan [APP-085]).	
RR-0793-020 (Oxfordshire County Council)		1.17 The proposed mitigation does not match the scale and impact of the development. As outlined in our PEIR response we encourage a landscape-scale approach to be adopted, that offers a more holistic approach to mitigation that matches the scale of the development, e.g. by (i) creating links between habitats and woodlands, (ii) maximising benefits for biodiversity and infrastructure (informed by the ecological survey information and the emerging Local Nature Recovery Strategy) and (iii) maximising opportunities to expand and improve the PRoW network in line with EN-3, which encourages applicants to "consider and maximise opportunities to facilitate enhancements	

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		to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites ...”(EN-3, para 2.10.44). 1.18 Adverse effects on residential areas and heritage areas and their setting are also a concern. The application proposes a standard minimum buffer of 25m to adjacent residential areas (i.e. an increase by 5m from the PEIR), however, this distance does not appear to be informed by any assessment work, and the justification for this approach is not clear. We believe that the distance and treatment of buffers should be determined on a site-by-site basis and informed by assessment work. 1.19 It is anticipated further detail on potential mitigation and enhancement of the scheme will be provided in the LIR.	
RR-0793-021 (Oxfordshire County Council)		Management/Maintenance 1.20 It remains unclear what landscape elements provided as part of the scheme will remain in place after decommissioning. The application states that the mitigation will deliver long-term landscape and ecological benefit, but this only applies if new vegetation and habitats remain in place and are protected in the long-term. 1.21 The LVIA [APP-045] states that landscape management would be required for a period of five years (Para 8.9.259), which is wholly insufficient and in stark contrast to the approximately 40 years lifespan of the proposal and with the 30 years management referred to in the Outline Landscape and Ecological Management Plan (oLEMP) [APP-235]. Woodland creation and hedgerow establishment require long-term management to provide long-term benefits and an initial 15-year period of management and maintenance is expected as a minimum to align with the assessed residual landscape and visual effects. Management should then subsequently be regularly reviewed at a reasonable period, such as every three to five years. 1.22 The DCO should include an appropriate period of landscape maintenance, that ties into the oLEMP.	
RR-0793-022 (Oxfordshire County Council)		In summary: 1.23 The development will replace large areas of agricultural land with solar development. By reason of its nature, mass and scale, the proposed	

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		development will alter the landscape character at a large scale affecting the current openness, tranquillity and agricultural character. It will also significantly affect the visual amenity, with effects on the PRow network and nearby residential areas being of particular concern. 1.24 The development as proposed is not supported in landscape and visual terms. 1.25 Further information and revisions are required to address concerns outlined in our PEIR response and above.	
RR-1076-003		1. The visual impact of the huge scale of the BWSF scheme, larger than London Airport, on the village of Church Hanborough, its beautiful landscape setting, and surrounding area would be devastating 2. The loss of green space and the outstanding views of the countryside, of the hills, of the fields, of the woods, resulting from this scheme will affect the health and wellbeing of people through its dominant visibility from areas all over the Parish.	As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change. The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays.
RR-1076-014		The entire Parish is within the 2km Community Consultation Zone and within the Zone of Theoretical Visibility.	
RR-870-002		2. Chapter 8 - 'Landscape and Visual Impact Assessment'. The solar farm will use fencing to protect both people from harm and electrical equipment from damage. Over time the solar panels will be hidden from view by new hedgerows. The summary in PVDP Section 8.14.4 concludes: "Of the 55 Representative Viewpoints assessed as part of the Environmental Statement, it is concluded that there will be 12 Major adverse (significant) visual effects at winter Year 1 (following the Construction phase of the Project) only, from views available at Representative Viewpoints 5b, 5c, 13, 17, 25, 26, 32, 33, 38, 39, 50 and 54 arising from the Project during the operation and maintenance phase. These effects would diminish other time, with no residual significant visual effects predicted at summer Year 15.". Oxfordshire Ramblers strongly disagrees with this conclusion. In Year 1 the view from the viewpoints listed above will be of acres of solar panels. With the new planting the view of the solar panels will diminish over time due to the 2-3 metre high hedges. However these hedges will then completely obscure the views of the countryside that we currently enjoy. Our conclusion is that	

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		there will be 12 major adverse (significant) visual effects for the duration of the project i.e. for decades to come. *We estimate that 28 km of footpaths would be affected by the overbearing fences/hedging. In addition to the impact on views of the countryside the fences would also have a negative impact on the free movement of wildlife: walkers enjoy seeing wildlife along footpaths and in the neighbouring fields. *A good example of the impact of the fences and hedges (one of many) is shown in 6.4ES-Fig 8.148 to 8.371 Photomontages (Winter and Summer) Part 6 Representative Viewpoint 32: View looking north west from footpath 124/5/10, near Begbroke.	
RR-1086-11 (VWHDC)	Visual Disruption as responses above.	There is further concern about the LVIA work and how this underplays the impacts of the scheme but without taking these concerns into account VWHDC is unsure of how the LVIA work has been used to inform the scheme Masterplan, especially for location of solar arrays. There has been little adjustment to the layout of solar arrays in reference to where impacts including significant impacts have been found to reduce Landscape and Visual effects. This issue was touched on in the council's response to the PEIR where it indicated that 'the layout of the scheme does not indicate that there has been much modification to the design of the scheme to minimise impacts in response to receptors and constraints. For example, small areas of solar panels within the southwestern area of the site either side of the footpath and adjacent to the ancient woodland are retained rather than a broader look at the project at a landscape and project scale to see if it would be more appropriate not to include these small areas of solar. Again, small areas of solar arrays are formed once servicing constraints are added south of Denman's Farm. It may be more appropriate due to the proximity to the PRoW and the residential property not to have these small areas under solar panels.' However, there does not seem to have been a review of the masterplan in response to these comments. Another example is the area around Stratford Lane and the B4027, Illustrative Masterplan Figure 2.1B North Site Area 2 of 2. This illustrates that the Masterplan should be revised to reduce the impact of the scheme.	Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology set out in sections 8.4 and 8.5 of the LVIA [APP-045] to support those judgements. All the landscape consultants that have worked/are working on the project are Chartered Members of the Landscape Institute and experienced in assessing the landscape and visual effects of solar farms within this type of landscape.
RR-1086-12	Viewpoints	The removal of areas of land due to archaeological constraints, has left two small areas of solar either side of PRoW 416/24/10, and a small area of solar to the south on the higher land. The Masterplan	The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual

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		proposes a new cycle link through this area to connect to the National Cycle Route which runs through the centre of the northern site area. Section 8.9.162 of the EIA covers representative Viewpoint 8: View looking southeast from footpath 416/24/10, near Hordley House. It states a part of the northern site would be visible on top of the pronounced ridgeline across the view. Solar panels would appear as a single row over the ridge. However, the viewpoint description does not describe the impact to the rest of the footpath as it passes through the middle of the solar panels. Section 8.9.168 Representative Viewpoint 11: View looking west from bridleway 379/10/20 (Clause Duval Way). States that solar panels would occupy rising ground to a ridgetop in the middle view. VWHDC query if the assessment of the viewpoint is correct. If it is a high sensitivity user with a noticeable change, then the impact would be higher than Moderate and would be Significant. The above illustrates that if the Masterplan was looked at holistically after constraints were added, the more isolated areas of solar which are prominent in views from PRow, that have PRow routes passing through them or adjacent to them and are often on higher ground should have been removed to better balance provision against impact. The Masterplan therefore needs to be revisited and revised to reduce the impact of the scheme in numerous areas, including other areas with similar concerns with regards to locations of solar panels such as Bladon, Worton Heath, the Priory Area east of Begbroke, east of Pinsley Wood, south of Church Hanborough, north of Cassington/ Yarnton Road, Denman's Farm and also west of Cumnor Road.	Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP_149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045]. The Landscape and Visual Impact Assessment [APP_6.3] has identified and acknowledged a number of significant effects upon visual amenity. Particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP_6.3], at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape. The Project's main elements, i.e. the solar panels, have a maximum height of 2.3m, and follow the natural contours of the local landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located.
RR-1086-13	Suitability in landscape character and LVIA terms	Section 5.6 of the EIA covers the site location and scale and section 5.6.15 says 25.6.15 'After negotiations with many other landowners in the area, the Applicant secured land at Denman's Farm, immediately under the 400kV line to the west of Botley'. However, it does not necessarily follow that the offered land is suitable for solar development. With regards to the Denman's Farm area, the proposed solar development in the Vale is predominately on open exposed slopes in the Greenbelt, which the Vale do not assess as suitable for solar development due to the harm to the open and rural landscape character and impact on views. This is supported by the comments in the letter from Cultural Landscapes and Historic Gardens Committee of ICOMOS-UK (International	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan [APP_062]. The project is considered fully reversible, unlike residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries, which provide structure to the landscape, would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed.

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		council on monuments & sites) dated 26th July 2024 - '3. South Solar Farm, SE of Farmoor Reservoir: (2km E-W; 0.7 km maximum width; 17 small bays; substation at western end with access to overhead power line which crosses northern part of site.) At least half of this proposal is on exposed north facing arable slopes, which would be highly visible. It would almost certainly be obvious from Farmoor reservoir recreation area. The site is in the Oxford Green Belt with footpaths useful to the population of the nearby city, being accessible by bus. This site is an unsuitable place for a solar farm and should be omitted from the proposal. However, the substation site is well chosen in a fold of the land.' Furthermore, the emerging evidence base of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 includes suitable broad locations for renewable energy schemes, including Ground mounted solar on the Emerging Policies Map and under the CEQ Climate and Environmental Quality Evidence Base. It does not however indicate capacity for solar development within the proposed development site area. https://www.southandvale.gov.uk/joint-local-plan-2041-examination-library/.Emerging evidence also includes a Joint Landscape Character Assessment 2024 (which is considered the most up to date LCA for the district), Renewable Landscape Sensitivity Assessment, Tranquillity Assessment and Local Landscape Designation Review. The Candidate Northern Thames Valley Local Landscape Designation covers some of the south-western section of the Southern site area.	The Landscape and Visual Impact Assessment [APP-045], includes an assessment of cumulative effects at section 8.11. The Parish of Cumnor, in common with other areas within which the Project, is located in a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Thirty-three photomontages have been produced as part of the application [APP-072 to 080]. These demonstrate the impacts of the Project and illustrate that the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours. Existing public rights of way would be retained and have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. As such, the public's access would not be restricted. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change.
RR-0102-005		BPC would like to bring to the Inspectors' attention that the only public open space in the village is Bladon Recreation Ground. Despite the proposed buffer zone, the placement of the solar panels close to the recreation ground will significantly alter the view from this area. Instead of open views, residents will predominantly see a large expanse of solar panels when trying to enjoy the facilities	Rationale for the buffer zones can be found at RR-0135-10 below. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The masterplan includes a length of hedgerow and tree planting at the edge of the Project nearest the Bladon recreation ground. This will be managed to a suitable height in order to minimise the visual impact of the solar arrays in this area. It is acknowledged that views to the Project would likely remain, even with the mitigation in place, however, views to the Project from this location would be to a small part of it, with no appreciation of the Project as a whole from this location.
RR-0102-010		There are several PCS located in Bladon Parish including near the residential areas of Heath Lane and Church Street, in the field adjacent to Bladon	It is possible that noise from the PCS units will be slightly audible in some areas of some PROWs. However, it is not uncommon for industrial noise to be audible on PROWs, as is experienced alongside the Siemens factory in

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		Recreation Ground and in close vicinity to many footpaths that run through the development. The locations of the PCS's could affect residential and recreational areas and also the PROW's.	Whitney. Furthermore, receptors on PROWs are transient, and so any potential impact experienced by noise from the development, whilst on a PROW, would be for a very short period of time, thereby reducing the magnitude of nay impact.
RR-0135-1		Not only will the development dominate the Parish in terms of area but because of the location of solar arrays on the slopes of the hills in the north of the Parish they will be visible over many kilometres of distance from multiple directions transforming what is now a chequerboard of open fields divided by hedgerows to an industrial / urban landscape. This issue is also identified by West Oxfordshire District Council (WODC) "WODC also suggest that development be restricted from land to the north of Cassington. Although the masterplan indicates that development would be set back from the edge of the settlement in this location, land rises steeply to the north of the settlement making any development in this location prominent and visually exposed" (Table 8.6 Environmental Statement Volume 1 Chapter 8 Chapter 8: Landscape and Visual Impact Assessment [LVIA]). In addition, they recommended "removal of development areas from the visually exposed and prominent valley sides to the west of Lower Road and valley sides of the River Evenlode could minimise negative impacts of the proposal" (Table 8.6 Environmental Statement Volume 1 Chapter 8 Chapter 8: Landscape and Visual Impact Assessment [LVIA]). Furthermore "WODC considers that much of the proposed development area is within a highly valued and high-quality landscape with limited capacity to accommodate significant change, particularly at the scale currently proposed." (Table 8.6 Environmental Statement Volume 1 Chapter 8 Chapter 8: Landscape and Visual Impact Assessment [LVIA]). We also refer to a letter written to PVDP by ICOMOS dated 26th July, 2024. In this letter, expert independent opinion is provided by Hal Moggridge OBE VMH PPLI FIHORT RIBA AADIP on the current proposal (ICOMOS, 2024). He states: "Solar arrays are proposed far to close to Cassington Village. There should be wide open fields between the NW edge of the village and dense new hedges planted along the solar array boundary. Much of Bays 2.100, 2.102 and 2.110 should be excluded from consideration for development." The Bay numbers here refer to the original map of the scheme produced by PVDP November, 2022. Hal Moggridge goes on further to say that blocks alongside both the eastern and western sides of the Evenlode Valley should also be removed from the proposed development (ICOMOS, 2024). He concludes in general	

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		comments with respect to PVDP’s team that (ICOMOS, 2024): “...there seems to be an absence of a named independent landscape consultant, to ensure that the interests of local people and this attractive landscape receive proper consideration.” We agree with this statement and as detailed below point out the highly subjective assessment of landscape impacts in the Parish of Cassington and the consistent underestimation of impacts to conclude there are no significant adverse impacts likely after Year 1 of the project. On the basis of our own assessment, that of WODC and other district councils, the county council and Mr Moggridge, we find that the mitigations proposed to prevent a significant impact on the landscape within and surrounding the Parish of Cassington are inadequate, that the assessment of visual impacts are subjective and underestimate how this project will transform the landscape of this naturally beautiful part of Oxfordshire, part of the setting to Blenheim Palace World Heritage Site and the City of Oxford and its historic colleges. We quote from Volume 1, Chapter 8 of the Environmental Statement that the NPPF (Para 36) requires that “plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally designated landscapes but also the wider countryside”. This proposal falls far short of this requirement by the NPPF and in fact has a severe and negative impact on the countryside of the Parish of Cassington and surrounding area. We specifically identify the following issues with the LVIA. 1.1 Viewpoints from private properties Referring to Paragraphs 8.6.78 – 8.6.80 of the LVIA we point out that the 2.3m height of solar arrays is not low level and, furthermore, other associated infrastructure such as Converter Stations (up to 3m high) and Substations (up to 6m high) are much higher. Along the northern edge of Cassington, as well as at Jericho Barns and Purwell Farm and Burleigh Farm the proposed development will come to within 25m of the curtilage of properties. It is inconceivable that private views will not be substantially adversely affected especially when those views are of land rising to the north or northeast of the affected properties (Cassington Village, Jericho Barns), or where properties are surrounded by the development (Purwell Farm, Burleigh Farm). At present, residents of these properties enjoy open views of fields rising on hills as part of the Eynsham Vale / Upper Thames Clay Vale. This will be transformed into an industrial landscape of glass-covered fields, likely reflecting	

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		the sun at certain times of day. We are aware that up to 500 properties across the whole of the Botley West proposed site are similarly in close proximity to the development. It is very clear that an RVAA is required for this development. Views from outdoor recreational facilities The only specific outdoor recreational facility mentioned in terms of landscape impacts is Blenheim Palace Registered Park and Gardens (8.6.67). The LVIA then goes on to claim that “People involved in sports and other formal recreational activities at a rural location are considered to have a Medium sensitivity to the Project. This is because the focus of their attention is generally on the activity in question (e.g. football); appreciation of the surrounding environment is secondary” (8.6.68). This is then used to justify: “There is little potential for the proposed solar arrays and / or substation to visually affect the above resources in a significant way and therefore they have not been taken forward for detailed assessment” (8.6.69). We point out that our own recreational fields abut directly to the proposed development. Yes, they are used for outdoor sports (football, hockey, tennis and cricket) but they are also used regularly by walkers and have an outdoor gym and play equipment. The location is also used for celebrations over the spring and summertime as well as major events such as Cassington Bike Night, the biggest annual fundraising event in the village calendar. Therefore, there is likely to be a significant loss in amenity value of the Village Sports and Recreational Grounds and the benefits of using such outdoor space. We view it as an error of judgement that such impacts have been excluded.	
RR-0135-3		Open views from both the Low Road and Cassington Road will be severely harmed by this development. The sides of the beautiful Evenlode Valley will be largely obliterated by solar panels. The views of open fields lying to the west and east of the Cassington Road, including the views up to the edge of Bladon Heath and Burleigh Wood will likewise be destroyed. The Central Section of the Solar Power Station will likewise impact on views from the A44, a main route to Blenheim Estate WHS and will impinge on that of the A40. Overall, the impacts on local residents using these roads will be considerable because of the conversion of this open countryside to an urban landscape. It will lead to a grievous sense of loss to our residents and overall, a large-scale downgrading of the rural landscape of the area. 1.5 Summary of Landscape Impacts PVDP summarise their findings on landscape impacts in section 8.14 Summary of	The potential impacts of the Project upon all sensitive Landscape and Visual receptors, within the 5 km Study Area, including views from Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. All existing vegetation along Lower Road would be retained and managed. This would help to minimise the visual impact from the Project for road users along Lower Road and other local roads. The Project's main elements, i.e. the solar panels, have a maximum height of 2.3m, and follow the natural contours of the local landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228].

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		Effects, mitigation measures and monitoring. We contend that the conclusions that “No significant effects are predicted during construction, operation and maintenance or decommissioning of the Botley West Project on landscape character areas within the 5 km study area” are made on the basis of a subjective study where decisions have been made during the assessment to bias conclusions that the scheme will have no impacts on landscape. As reflected by the comments of local governing bodies and an independent expert landscape consultant and based on our own local knowledge of the area, the Central Section of this proposal can have nothing but a serious and significant impact on the landscape of the Parish of Cassington, by virtue of its scale, its unsympathetic and ill-considered distribution on sensitive landscape and lack of consideration to residents, their use of amenities and the overwhelming visual impact this scheme will have as they go about their general activities, such as commuting to work, travelling for leisure or shopping or otherwise.	All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured. Due to the undulating nature of the topography in the local area it would not be possible to entirely screen the Project. However, there would be no location on the public right of way network where the whole Project would be visible.
RR-0135-10		Buffer Zone PVDP have publicly made the point that they have increased the buffer zone of the Botley West Solar Power Station from 20m to 25m in response to comments in the consultations. This barely perceptible increase in buffer zones from the solar farm to the boundaries of properties lying immediately adjacent to the Solar Power Station is inadequate. Whilst data on buffer zones is often not available for solar farm developments an examination of other projects in the U.K. shows that 25m is below what other developers consider a reasonable distance. These include: • Chimmens Solar Farm, Kent (https://www.chimmens-solarfarm.co.uk/faq/) Buffer zone of 100m. • Ship Meadow, Suffolk (https://www.shipmeadow-solarfarm.co.uk/) Solar Panels 100m from residential properties, Inverters, 200m. • Cottam Solar Farm, Lincolnshire (https://www.cottamsolar.co.uk/) Buffer zone of 50m to properties. Evidence of what occurs in other countries is also hard to come by but one example of information provided by a US solar company, Go Solar Florida (https://gosolarfloridastate.org/) recommends a buffer zone of 500m from residential property for large solar and 200m for small projects. Examination of the academic literature related to planning of solar farms both in the U.K. and in Europe indicates that they also use a standard buffer distance from residential property or towns and villages of 500m (e.g. Castillo et al., 2016; Palmer et al., 2019). The reasoning for this given in Castillo et al. (2016) is: “In terms of populated	Professional judgement was used to determine a minimum 25 m buffer zone, from individual properties and settlements, has been incorporated into the Project. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which further limits the effects of the Project. Mitigation, as shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228] , was included to further screen available views from residential properties.

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		areas, the appropriated site for the solar farm should consider a buffer distance in order to avoid most direct impacts and resistance of the local communities (Turney and Fthenakis, 2011; Tsoutsos et al., 2005, Janke, 2010). In this sense, locations at distances greater than 500m from cities/residential areas (more than 1 inhab/ha) were considered more suitable for PV system installations.” We believe the proposed buffer zone of 25m is far too narrow where the Botley West Solar Power Station abuts villages and residential properties. This is not the sole view of Cassington Parish Council and the residents of Cassington and Jericho Barns but is also supported by the opinion of an independent landscape expert Hal Moggridge, as pointed out above. We view 25m as an inadequate buffer because of the visually intrusive nature and scale of the proposal on views of the landscape currently enjoyed by residents of properties adjacent to the proposed development. It is also intrusive to the residents of Cassington Village and Jericho Barns going about their business and amenity activities in the area. Sound and other activities during construction and operation will also be a source of disturbance inadequately mitigated by the narrow buffer zone	
RR-0198-1		Visual impact - the tranquillity of Combe and the visual amenity of its pastoral setting are highly prized by its residents (see Combe Village Design Statement, 2023). The proposed large-scale solar farm development, with its extensive array of panels located in many places on elevated land, will be visible from the village, notwithstanding the proposed mitigation measures. Combe Parish Council contends that the development will negatively impact on the quality of this rural environment and the distinctive setting of Combe in the Cotswold National Landscape.	The valley includes Farmoor reservoir, which is a manmade structure of some size, as well as hosting a section of the A420.,
RR-0205-2		‘Openness’ has been ruled by the Supreme Court not to be merely a matter of the volume of a proposed development but also its visual impact. The solar power station would clearly have a hugely negative visual impact. The section in Cumnor, in particular, would, as the map on page 3 above shows, fill much of the scenic agricultural valley between the Cumnor Village Conservation Area, the world renowned Wytham Woods and the Farmoor Reservoir recreational area and local wildlife sites, and virtually all that valley when combined with the proposed Red House Farm power station and the substation National Grid is proposing to build to serve Botley West.	GLVIA3 (LI and IEMA) refers to ‘openness’ once - in the context of perceptual landscape characteristics (paragraph 5.4). It is not part of visual impact. The Landscape Institutes position on this is reiterated in LI TGN-2024-01, at point 9(4) which, in response to the question <i>"How does LVIA relate to green belt and 'openness' issues?"</i> explains that <i>"As stated in GLVIA3 paragraph 5.4, 'openness' may be one of the aesthetic and perceptual aspects of the landscape...."</i> Views can be described as open, as opposed to enclosed. The views to Wytham Wood from Cumnor village are not interrupted by the solar farm. It is not desirable to screen all views of the Proposed Development, as this Relevant Representation notes, as open views will be blocked, i.e. the landscape mitigation has a larger adverse impact than the Proposed Development. Rather the landscape mitigation addresses those views where

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		The valley in which it would lie is visible from the elevated parts of the Parish and Wytham Parish, and the views of it are designated as Important Views in the policies of the Cumnor Parish Neighbourhood Plan (CNP). The developer argues that these impacts can be mitigated in due course by the use of hedges, but given the difference in elevations, that is clearly not the case, unless the hedges are also planted at the top of the hills, in which case they will not preserve the view but will simply obliterate it	there are potentially significant effects and seeks to minimise any adverse effects. The Applicant acknowledges that views of the solar farm will remain at section 8.9 of the LVIA [APP-045]. However, through the proposed landscape mitigation shown on Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], these effects on views would be minimised, in line with the requirements of NPS EN-1 and NPS EN-3 (see response to RR-870-005 and 0793-005).
RR-0205-7		The applicant’s contention that adverse effects on openness can be mitigated by growing hedges to ‘hide’ the many hectares of industrial infrastructure is similarly false. Green belt openness has both spatial and visual aspects. Hedging high enough to ‘mitigate’ security fencing, CCTV towers, 2.3m high solar panel arrays, shipping containers, access roads etc. etc. will not maintain green belt openness, a key aspect of the protected ‘Important Views’ specified in CNP policy DBC7 (see also section 2.5 below), along with the setting of Ancient Woodland and the world renowned Wytham Woods SSSI, from which the entirety of the proposed southern site would be visible, no matter how high the hedges grow. As just one example of the applicant’s failure to demonstrate ‘very special circumstances’, including considering alternatives, the application in this Parish includes locating solar panels and other equipment at elevations (95m-70m AO) visible for several km, on an exposed north facing slope, shaded to the south by Ancient Woodland. CPC lacks the resources (people and £) to provide a highly detailed critique of the applicant’s assertions about adverse impacts on landscape: spatial, visual and amenity. However, what CPC does have is a detailed understanding of the Parish, including its residents’ use of the rural environment and their mental and physical health benefits accruing from the landscape, both through the publicly available evidence base for its made Neighbourhood Plan and through the lived experiences of its residents and visitors. Combined, these factors highlight significant shortcomings throughout the applicant’s submissions relating to Landscape and Visual Impact (LVIA); their methodology and their assertions. These shortcomings, whether repeated assertions that impacts can be downplayed because they are temporary, where temporary actually means 40+	GLVIA3 (LI and IEMA) refers to ‘openness’ once - in the context of perceptual landscape characteristics (paragraph 5.4). It is not part of visual impact. The Landscape Institutes position on this is reiterated in LI TGN-2024-01, at point 9(4) which, in response to the question <i>"How does LVIA relate to green belt and 'openness' issues?"</i> explains that <i>"As stated in GLVIA3 paragraph 5.4, 'openness' may be one of the aesthetic and perceptual aspects of the landscape Where this is the case, it would be documented and assessed as part of the LVIA. Green Belt is a planning policy designation and compliance with policy should be addressed separately to the LVIA."</i> As such ‘very special circumstances’ is considered within the Planning Statement. LVIA is concerned with the effects on landscape character and the views available to people. GLVIA 3 states <i>"An assessment of visual effects deals with the change and development on the views available to people and their visual amenity"</i> [GLVIA3 emphasis]. Visual assessment does not consider settings of inanimate objects. There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology set out within the LVIA [APP-045] to support those judgements. All the landscape consultants that have worked/are working on the project are Chartered Members of the Landscape Institute and experienced in the assessment of solar farms within this type of landscape. Neither the EIA Regulations nor GLVIA3, or subsequent landscape Institute technical guidance notes set out a formulaic/standard set of criteria / definitions for sensitivity, magnitude of impact or significance. The LVIA uses the methodology detailed at section s 8.4 and 8.5 of the LVIA [APP-045]. The methodology and its application are clear and transparent, as required by GLVIA3. The assessment of the significance of effects that would be experienced by users of the Public Rights of Way, as set out in section 8.9 of the LVIA [APP-045], follows that methodology. Where possible, viewpoint locations were selected based on published important views, such as those identified in the Cumnor Parish Neighbourhood Plan Important Views Report February 2021. As stated, all

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		years, or poorly referenced and described so-called 'representative viewpoints' and photomontages, all generate a significant level of concern locally about the methodology, and the experts, chosen by the applicant to make their case. As just one example, the significant adverse effects on CNP Policy DBC 7 'Important Views', are swept under the carpet by the simple expedient of not including views from numerous places, including CNP Viewpoints 5b, 12, 23, 7, 12 and 17. Cumulative landscape and visual impacts are inadequately addressed, especially in the context of the proposed permanent National Grid substation and the immediately adjacent proposed Red House Farm solar power station where the application fee is currently being appealed by its applicant. Furthermore, despite the applicant acknowledging that they need to demonstrate an iterative process of design, all that is apparent is that ultimately futile attempts to 'hide' panels and shipping containers in a steeply sloping open arable landscape, leads inevitably to other adverse impacts.	viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects. Important views within the Cumnor Parish Neighbourhood Plan Important Views Report February 2021 were considered, with many discounted due to the focus and / or direction of the views. Where possible important views were included, taken from publicly accessible location as close as possible to the published view(s). These include Representative Viewpoints 45, 46 and 53 [APP-065 and 066].
RR-0376-3		The impact the solar farm will have on the Parish of Hanborough 1. As well as the panels coming too close to Pinsley Wood, the panels abut the conservation area of the village of Church Hanborough. 2. Hanborough is a rural village parish with its main character dictated by its rural setting. The solar panels situated right up to its boundary will have a huge impact on that distinct setting. The vast size of the 'farm' will destroy significant views and have a negative impact on people's wellbeing.	
RR-0964-1		Proximity and Visual Impact: The northern section of the proposed solar farm, encompassing approximately 316 hectares, is adjacent to the parish boundaries. This proximity raises concerns about the visual impact on the local landscape, particularly near areas like Weaveley Furze, a mature woodland valued by the community.	
RR-1035-1		The visual impact on the landscape/countryside	
RR-1109-1		If the Planning Inspectorate is minded to accept the need for Solar generating capacity, despite the arguments against that provision in this location, then the WPC would want to see changes to the following in respect of the Northern Site: 1. The current plan causes considerable detrimental impact on the visual amenity to residents and	

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		visitors (including recreational walkers) at the western edge of the DCO site. In particular, existing and future residents of Dornford Cottage would benefit from a guaranteed buffer of 120 metres minimum between the boundary of the property and the solar panels. This minor alteration would also offer a much better experience for visitors and walkers along the adjacent footpath. See map below at points marked in a yellow line. (map will be sent if possible)	
RR-1086-7 Vale of White Horse District Council		VWHDC has concerns about the Methodology and Assessment of the Landscape Character and Visual Impacts of the scheme and opine that the project should not be considered temporary when assessing the impact. There are also issues with the classification of significance. VWHDC raise concern about the underlying Methodology of the assessment. Section 8.5.22 states "For the purpose of this assessment, any effects with a significance level of Moderate or less are not considered to be significant in terms of the EIA Regulations." However, assessment is not as simple as this statement implies. When assessment results in multiple negative effects, such as on connecting PRoW routes, cumulatively this would result in a significant impact. Each assessment of an effect should not be looked at in isolation and discarded as not significant but viewed holistically as part of the whole picture. In the table on page 24 of Chapter 8, it is stated 'Assessment considers effects from individual Representative Viewpoints. But it is acknowledged within the LVIA that effects may be present along length of the PRoW or roads for example.' However, there is limited reference to this in the wider LVIA. In section 8.9.125 it states: 'However, where Moderate significance of effect has been identified at multiple points along the same PRoW, sequentially these Moderate adverse effects could be considered significant.' This is not picked up elsewhere in the LVIA, and VWHDC therefore do not consider that the landscape and visual impact of the development including the PRoW network is adequately covered in the LVIA.	Neither the EIA Regulations nor GLVIA3, or subsequent landscape Institute technical guidance notes set out a formulaic/standard set of criteria / definitions for sensitivity, magnitude of impact or significance. The phrase 'significant in EIA terms' holds no specific meaning (GLVIA3, paragraph 3.32). The LVIA uses the methodology set out at Section 8.4 and 8.5 [APP-045]. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24). The assessment of the significance of effects that would be experienced by users of the Public Rights of Way, as set out in paragraphs 8.6.45 to 8.6.61 of the LVIA, follows that methodology. GLVIA3 explains that <i>"There are no hard and fast rules about what makes a significant effect, and there cannot be a standard approach since circumstances vary with the location and landscape context and the type of proposal"</i> (paragraph 5.56). GLVIA3 also notes that <i>"Even with qualified and experienced professionals there can be differences in the judgements made" ... "Ideally and for complex projects more than one person should be involved in the assessment to provide checks and balances, especially in identifying the likely significant effects"</i> (GLVIA3, paragraph 2.25). Three Chartered Members of the Landscape Institute, all with experience of assessing the effects of solar farms have worked on the Project and their findings / assessment can be found within the LVIA [APP-045]. Additional checks and balances have been provided by other, experienced practitioners, Chartered Members of the Landscape Institute, within RPS, who have not been involved with the Project. Where possible, viewpoint locations were selected based on published important views. All viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects.
RR-1086-15 Vale of White Horse District Council		The way information is presented in the Landscape Chapter of the ES makes it difficult to follow the submitted information and cross referencing between multiple sets of information is required to be able to read and look at the submitted information.	Where possible, viewpoint locations were selected based on published important views. All viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects. The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including

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		For example, the Representative Viewpoints. The location of these is given on the Representative Viewpoints Figure Number 8.11. This uses 1:50,000 as base mapping, so it is difficult to see the exact locations of these Representative Viewpoints on the ground and 1:50,000 mapping gives limited information with regards to field boundaries, 1:25,000 mapping even if it is not to scale is easier to follow. The ZVT shading on plans makes it hard to follow the PRow network in and adjacent to the site. There are no plans where the viewpoints are shown on the Masterplan layout, to help understand what can be seen in the Representative Viewpoints. Due to the scale of the application, it is difficult to cross reference plans to understand how viewpoints relate to the site layout. There are no Plans in the Landscape Package which clearly illustrate the existing and proposed rights of way (by type), and associated PRow numbering which are referred to in the text. While a numbered PRow plan is giving in Figure 17.5, there is no plan where this information is proposed on the Masterplan to aid understanding of the Representative Viewpoint Locations. Whilst Representative Viewpoints do have a 1:50,000 plan extract, they do not contain the scheme layout to aid understanding of the view. Mapping at 1:50,000 also does not aid with the understanding of field boundaries, the viewing arrow is small and does illustrate the extents of the view on the photograph. Photomontages do not contain a map extract to aid their understanding and illustrate the section of view shown and how that relates to the site layout. Concern with the presentation of photo viewpoints and visualisations were raised in our consultation response to the Scoping dated June 2023 and the PEIR, and some of these concerns are still present. Volume 3 Appendix 8.4: Photomontage Methodology 1.1.1 refers to methodology used for annotated photographs, photomontages or photo wireline, but predominately only covers the photomontages. A request was made at the PEIR stage that due to the scale and public interest of the project, for all viewpoint plans to be annotated with key features and have wirelines to highlight the areas of the proposed solar arrays (but not necessarily full modelling of the arrays), so the areas and extent of the scheme can be easily understood by all. A map extract to indicate the	Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3]. The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan [APP_062]. The project is considered fully reversible, unlike residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries, which provide structure to the landscape, would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed. The Landscape and Visual Impact Assessment [APP_6.3], includes an assessment of cumulative effects at section 8.11. The Vale of White Horse, in common with other areas within which the Project, is located in a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Thirty-three photomontages have been produced as part of the application [APP-072 to 080]. These demonstrate the impacts of the Project and illustrate that the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours. Existing public rights of way would be retained and have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. As such, the public's access would not be restricted. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change.

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		location of the view is also useful and recommended by guidance. Concern was also expressed that some viewpoints and visualisations did not cover the whole extents of the view of the solar farm from that viewpoint, for example VP48 and VP45. VP5, has a 5a, 5b and 5c covering views in different directions and that approach should also be provided for others such as VP48 where the scheme is present to the east and west of the northern viewpoint included in the ES. VWHDC also raised concerns (both Scoping and PEIR) that the range of viewpoints are limited, such as the wider footpath network to the north and east of the site. GLVIA expects the identification of the people within the area who will be affected by the changes in views and visual amenity. The now withdrawn P23/V2624/FUL Red house solar planning application (a similar scale to the southern area of Botley West) used 30 different photo locations covering 13 different routes in its assessment report. In contrast Botley West uses 11 to cover the southern extents of the application. This is not comprehensive enough for the scale of development and does not fully cover views from the PRoW network. There are numerous places that views have not been taken, including those highlighted in the Cumnor Neighbourhood Plan such as Viewpoint 5b, 12, 23, 7, 12 and 17. The plan below was provided as part of the PEIR response and highlighted views from the Neighbourhood Plan along with other locations that had not been covered by the assessment. Additional viewpoints were requested from these locations as part of the PEIR, and concern was also raised about the range of viewpoints being limited at the Scoping Stage. Our previous comments also included that the impact of mitigation on views and landscape character needed to be considered in the LVIA assessment. Many available views are larger scale over the wider landscape, whereby screening a view so solar panels or other development cannot be seen also has the impact that the landscape scale view is no longer obtainable. This potential impact of mitigation should be covered and factored into the assessment of views. VWHDC currently do not see that there has been assessment on how mitigation to prevent seeing the solar panels impacts on the ability to enjoy the changing views of the landscape within the EIA.	

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		Further comments on the magnitude of these effects and the effectiveness of any proposed landscaping mitigation will be provided through the LIR. The proposal for the Botley West Solar Farm is not acceptable. However, as part of the Development Consent Order process the LVIA, EIA and associated documents should be revised to better cover the impacts of the proposal and be used to help look at the acceptability of the Masterplan and to help shape the Masterplan to reduce the impact of the proposal. The proposed solar arrays in the Vale of White Horse should be removed from the application. As this is a larger scale project over multiple areas, the EIA needs to acknowledge this and cover these impacts in sufficient detail for all areas so the journey from baseline to the Masterplan can be clearly understood and the scheme designed to minimise its impact.	
RR-1102-5 West Oxfordshire District Council		West Oxfordshire District Council consider the proposed location to be particularly sensitive due to the character and quality of landscape, the concentration of significant heritage assets, the value of soil resources and the presence of important ecological resources. There are opportunities to enhance landscape, ecology and heritage assets within the project area but it is not clear how an iterative design approach recognises such opportunities, other than where interventions are proposed to mitigate the visual impacts of the proposal and to screen it from view.	The potential impacts of the Project upon all landscape and visual receptors, within the 5 km Study Area, including Public Rights of Way (PROW), have been assessed within the submitted Landscape and Visual Impact Assessment (LVIA) [APP-045]. The Applicant acknowledges that views of the solar farm will remain at section 8.9 of the LVIA [APP-045]. However, through the proposed landscape mitigation shown on Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], these effects on views would be minimised, in line with the requirements of NPS EN-1 and NPS EN-3 (see response to RR-870-005 and 0793-005, above). The effects of the Project on the setting of the Blenheim Estate World Heritage Site and other historic assets have been assessed within ES Chapter 7 - Historic Environment [APP-044]. The existing PROW network would be retained and managed during the construction of the project in accordance with the outline PROW Management plan [APP-232]. They would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. As such, the public's access would not be restricted. For more information on effect on the public rights of way network see ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change. The effect on local wildlife and other important ecological considerations is assessed in ES Chapter 9 - Ecology and Nature Conservation [APP-046]. The Applicant has adapted the extent of the solar farm and increased distances from potentially sensitive receptors. The Applicant has also increased the amount of landscape mitigation, thereby minimising adverse effects on landscape and visual receptors, in line with the guidance in

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			National Policy Statement EN-1 and EN-3 (see response to RR-870-005 and 0793-005, above). Hedgerows have been proposed as part of the landscape mitigation proposals, as shown on the Illustrative Masterplan [APP-062]. These will be managed to a height of 3m to 4m, as specified in the outline LEMP. Existing hedgerows will be reinforced and managed to a height of 3m to 4m. This will be sufficient for most close views to be screened. More distant views on rising land will be available and this is acknowledged in the LVIA There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology set out in sections 8.4 and 85 of the LVIA [APP-045] to support those judgements. All the landscape consultants that have worked/are working on the project are Chartered Members of the Landscape Institute and experienced in the assessment of solar farms within this type of landscape.
RR-0164-017 Cherwell District Council		Landscape Visual Impact Assessment (LVIA) CDC has been involved in pre-submission meetings with the developer and has provided feedback in relation to the methodology and approach taken in assessing the landscape and visual impacts of the development. Though it appears that previous comments raised by Cherwell's Landscape Architect have been addressed in Chapter 8 – Landscape and Visual Impact Assessment of the ES with the inclusion of the security fencing, substation, secondary substations and power convertor stations there is still concern that the development would result in significant change and harm to the predominantly open and rural landscape character of the application site. The scheme would also have potentially harmful impacts upon the settings of villages and Blenheim Palace. CDC do not agree that the visual impacts, as experienced by users of the PRoW, can be satisfactorily mitigated with hedge planting on either side of footpaths/bridleways and it is contended that walking in an enclosed green corridor between new hedge planting would not adequately compensate for the experience of walking in open, sloping farmland with longer distance views. CDC observes that Landscape Architects representing VWHDC and OCC have outstanding concerns regarding the Methodology and Assessment utilised in the LVIA (particularly in respect of the definition of 'temporary' and how	In relation to the methodology and approach in assessing the landscape and visual impacts of the Proposed Development, neither the EIA Regulations nor GLVIA3, or subsequent landscape Institute technical guidance notes set out a formulaic/standard set of criteria / definitions for sensitivity, magnitude of impact or significance. The phrase 'significant in EIA terms' holds no specific meaning (GLVIA3, paragraph 3.32). The LVIA uses the methodology set out at Section 8.4 and 8.5 [APP-045]. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24). The assessment of the significance of effects that would be experienced by users of the Public Rights of Way, as set out in paragraphs 8.6.45 to 8.6.61 of the LVIA, follows that methodology. GLVIA3 explains that <i>"There are no hard and fast rules about what makes a significant effect, and there cannot be a standard approach since circumstances vary with the location and landscape context and the type of proposal"</i> (paragraph 5.56). GLVIA3 also notes that <i>"Even with qualified and experienced professionals there can be differences in the judgements made" ... "Ideally and for complex projects more than one person should be involved in the assessment to provide checks and balances, especially in identifying the likely significant effects"</i> (GLVIA3, paragraph 2.25). Three Chartered Members of the Landscape Institute, all with experience of assessing the effects of solar farms have worked on the Project, with their findings detailed within the LVIA [APP-045]. Additional checks and balances have been provided by other, experienced practitioners, Chartered Members of the Landscape Institute, within RPS, who have not been involved with the Project. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape, with some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed in the Illustrative Masterplan [APP-062], would

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		the significance of impacts has been applied). CDC would like this to be scrutinised during the examination and expects to present further comments and evidence on the landscape and visual impacts of the proposals in the LIR and during the examination.	allow for a more generous corridor, 5 m minimum width, within which the public rights of way would pass, in the majority of cases. The restoration of hedgerows and creation of new hedgerows would reinforce the structure of the landscape.
RR-0103-007		Bladon village is surrounded by rolling farmland and much of the landscape is open and visually sensitive. The views southwards out of the village and towards the development have been identified as being important in The Bladon Conservation Area - Conservation Area Character Appraisal. With the information provided, it is clear that the area around Bladon will be physically and visibly changed.	The potential impacts of the Project upon all landscape and visual receptors, within the 5 km Study Area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment (LVIA) [APP-045]. The Applicant acknowledges that views of the solar farm will remain at section 8.9 of the LVIA [APP-045]. However, through the proposed landscape mitigation shown on Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], these effects on views would be minimised, in line with the requirements of NPS EN-1 and NPS EN-3 (see response to RR-870-005 and 0793-005, above).
RR-0134-001		Impact on landscape, conversion of open farmland to industrial landscape. Visual impacts on allotment and surrounding area.	The potential impacts of the Project upon all Landscape and Visual Resources, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The Project's dominant elements, i.e. the solar panels, would be low in height, at a maximum height of 2.3m, and follow the natural contours of the local landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located. The Landscape and Visual Impact Assessment [APP-045] has identified and acknowledged a number of significant effects upon visual amenity. Particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP-045], at a very local level or where it would be difficult to entirely mitigate visual effects (not a requirement of this CNP infrastructure project). In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape.
RR-0789-002 Oxford Capital Partners Holdings Ltd		Overly imposing aspect of the proposed solar panel installations on hillsides where they are most visible. Impact on image and reputation of this great city and its environs, further reducing its attraction for tourists.	The potential impacts of the Project upon all Landscape and Visual Resources, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. Existing public rights of way would have managed hedgerows and trees to the north and

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			south, where appropriate, which over time would limit available views to the solar arrays. The Project's dominant elements, i.e. the solar panels, would be low in height, at a maximum height of 2.3m, and follow the natural contours of the local landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located.
RR-0794-006 Oxfordshire Gardens Trust		Views. A total of 55 representative viewpoints are assessed in the LVIA. However, not all of these are assessed in both directions. Critically, there is no consideration of views outwards from Blenheim Palace into the wider setting of the WHS where the solar panels would be located. This is a serious omission given the detailed analysis of the wider setting set out in the Blenheim WHS Management Plan of 2017, particularly Appendix 3h	The Zone of Theoretical Visibility (ZTV) [APP-082 to 084] shows that there would be limited intervisibility between the solar panels and Blenheim Palace WHS. Site visits were carried out within the palace grounds and upper floor of the palace to address this specific issue. A field of panels was removed from the Project as it was determined that it would have been partially visible, as indicated by the ZTV [APP-082 to 084]. Extensive existing vegetation within and outside the palace ground, along with topographical variation, prevent view to the Project from the Blenheim Palace WHS.
RR-0794-007 Oxfordshire Gardens Trust		An iterative Landscape Strategy is proposed to mitigate, reduce or avoid significant adverse landscape or visual effects. However the extent of retention of existing field boundary hedgerows, trees and woodland blocks is not clear nor is the extent of proposed re-enforcing of these with supplementary planting (BW Non-Technical Summary 6.3.15)	The landscape proposals are shown on the Illustrative Landscape Masterplan [APP-062] and the Landscape , Ecology and Amenities Plan [APP-228] , illustrates which hedgerows are to be retained.
RR-1050-004		The ability to access open country from this quiet, isolated village is one of the features which has attracted people and businesses to make this their home and it became invaluable to many during the recent pandemic. This access would be severely impaired if the scheme goes ahead and the current public footpaths, used by many dog walkers and hikers, would become tunnels surrounded by the industrial fences and panels. The proposed screens of hedges and trees would only serve to further reduce the views available currently and would take some years to become established, even if suitable maintenance is undertaken. The church is a particular landmark currently visible for many miles around and any remaining views would be impaired by the scheme, discouraging people from visiting.	Project Impacts will be mitigated against by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. The existing public rights of way network would be retained and managed during the construction of the project in accordance with the outline Public Rights of Way Management plan [APP-232]. They would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. As such, the public's access would not be restricted. For more information on effect on the public rights of way network see ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerow would be managed to an appropriate height (3m to 4m) which over time would help to screen some available views to the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured, however, due to the undulating nature of the topography in the local area it would not be possible to entirely screen the Project. However, there would be no location point along the public rights of way network where a visual appreciation of the whole Project would be possible. Rather, there would be intermittent, transitory views to parts of it. The effect is therefore lessened.

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			With all existing Public Rights of Way (PRoW) retained on their existing routes with hedgerows to the edge to minimise the visual effect of the Project. Views to local landmarks, including the Church of St Peter & St Paul, Church Hanborough would be maintained, as illustrated in the photomontage for Representative Viewpoint 38 [APP-072] .
RR-1007-018		The carrying capacity of the proposed sites' landscape to accommodate a solar farm of this scale is inadequate, which would result in long term, severe landscape and visual impacts.	The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection offer. The Project will have an anticipated generation capacity of approximately 840 MWe (AC output - total installed capacity approximately 936,000 kVA), which will provide secure and clean energy to the equivalent of approximately 330,000 homes.
RR-1007-020		The assertion that only 6 out of the 11 Landscape Character Area/ Types identified in previous landscape studies and which are affected by the Project, are judged to be of Medium /High Sensitivity is not an accurate representation of the value and sensitivity of the 3 proposed development sites landscape in 2025. 2.2.6 The Site's landscape importance and exceptional sensitivity in their capacity as the setting for, and gateway to, the internationally significant assets of: • The historic City of Oxford • The World Heritage Site of Blenheim Palace • The Cotswolds National Landscape • The historic market town of Woodstock • The burial place of Winston Churchill at Bladon • Numerous Listed Buildings and Conservation Areas	The potential impacts of the Project upon all landscape and visual receptors, within the 5 km Study Area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment (LVIA) [APP-045]. Of the 55 representative viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045]. Where possible, viewpoint locations were selected based on published important views, such as those identified in the Cumnor Parish Neighbourhood Plan Important Views Report (February 2021). As stated above, all viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects. The methodology for the assessment of the Botley West Solar Farm Project is based on the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) which recommends that an LVIA “concentrates on principles and process” and “does not provide a detailed or formulaic recipe” to assess effects, it being the “responsibility of the professional to ensure that the approach and methodology are appropriate to the task in hand” (preface to GLVIA3, page [roman numeral] X). GLVIA3 is the best practice guidance for LVIA. When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. Paragraph 3.32 of GLVIA3 explains that there are no hard or fast rules about what effects should be deemed to be significant. The assessment within Chapter 8: Landscape and Visual Impact Assessment [APP-045] is influenced by the proportionality principle expressed in paragraph 1.17 of GLVIA3 “identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that assessment should be tailored to the particular circumstances in each case.”
RR-1007-030		3.4 Landscape & Visual Impact Blenheim Palace 3.4.1 It is set out in the ES Chapter 08- Landscape and Visual Impact Assessment (“LVIA”) that receptors at Blenheim Palace are potentially sensitive to the proposals and that those visiting the site and using the open access land within the grounds are ‘key visual receptors’ who should be considered within the assessment. The Zone of Theoretical Visibility (“ZTV”) shows that there is the potential for views from within the gardens of Blenheim Palace. It is acknowledged that Blenheim Palace is a Grade I Registered Park and Garden (RP+G) and World Heritage Site (WHS). Within the summary description of the listing, reference is made to the views out from the park towards Woodstock, Bladon and the surrounding and distant countryside. 3.4.2 Despite the above, there are no representative views recorded from within the WHS/Registered Park and Garden. This is an oversight due to the reference to key views within the Historic England listing referred to above, the description of key views in the 2017 Management Plan (see Appendix 2) and the acknowledgement that it is a location for ‘key receptors’ in the LVIA. In addition, the roof of Blenheim Palace would be open to the public in Spring 2025 which will offer “breathtaking and wide-ranging views” of the countryside around Blenheim from which the Project will clearly be visible. Cotswold Area	

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		National Landscape (CNL) 3.4.3 The effects of the proposed development on the Cotswold Area National Landscape (CNL) are considered without any reference to the Special Qualities as set out in the Management Plan particularly with reference to views into and out from the CNL and the setting of the CNL itself. Although the proposals fall outside of the National Designation, they are in such close proximity (some 300m at the southern point in Bladon) that there should be detailed consideration of the potential indirect impacts on the surrounding landscape which contributes to the setting. Overall, the sensitivity of the landscape setting of the WHS and the Cotswold National Landscape have not been fully considered particularly regarding the value and susceptibility attributed to the landscape, recognising the contribution to the WHS and the CNL. Views Towards Oxford 3.4.4 Views towards Oxford from the surrounding countryside are valued. Policy was introduced in the 1960s and reinforced in 2015 through the 'Assessment of the Oxford View Cones'. The Project doesn't lie within a view cone, however the identified view cones do not represent an exhaustive list of viewing points that provide important views of Oxfords skyline and there are longer views available towards Oxford from within the study area. There is no narrative about the potential impacts of the development on the experience of the views of Oxford from within the study area. Impact on Landscape Character 3.4.5 Overall, the LVIA understates the potential impact on landscape character. The potential for areas of the landscape within the study area to accommodate solar array is limited due to the large potential for adverse effects on a highly valued and particularly scenic landscape. Parts of this landscape have physical, perceptual and experiential links to the most valued landscapes. The proposal and the approach to mitigation are not landscape-led and in some instances the mitigation proposed fundamentally changes the character of the landscape, to the detriment of key features. 3.4.6 We draw attention to the Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire dated October 2016 by LDA Design. This states within the Eastern Parks and Valleys Character Area that the potential to accommodate both solar farms and turbines is very limited within this character area due to the large potential for adverse effects on a highly valued and particularly scenic landscape. If developments are proposed then smaller schemes located in the Limestone Wolds character type and away from the highly susceptible Valleys and Parkland types are likely to	For the purposes of the Botley West Solar Farm Project, those effects of Moderate adverse or below are considered not significant. Taking the proportionality approach to the assessment, it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors. LI TGN-2024-01 further clarifies this approach stating that “...if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not.” (Issue / Question 3(5), Page 8). It is the Applicant's current position that the methodology used to assess the landscape and visual effects, of the Botley West Solar Farm Project, follows best practice guidance. The judgements made in the LVIA are clear, transparent and proportionate to the Project. The Zone of Theoretical Visibility (ZTV) [APP-082 to 084] shows that there would be limited intervisibility between the solar panels and Blenheim Palace WHS. Site visits were carried out within the palace grounds and upper floor of the palace to address this specific issue. A field of panels was removed from the Project as it was determined that it would have been partially visible, as indicated by the ZTV [APP-082 to 084]. As a result of this site visit it was determined that no Representative Viewpoint from within the Blenheim Palace WHS would be required, as there is no scope for the WHS to be significantly affected by the Project and there is limited intervisibility. Extensive existing vegetation within and outside the palace ground, along with topographical variation, prevent view to the Project from the Blenheim Palace WHS. The ZTV [APP-082 to 084] indicates that there would be the potential for intervisibility to the Project from a very small part of the Cotswolds National Landscape. There would therefore be an indirect affect upon it as a result. The LVIA [APP-045] includes an assessment of indirect effects upon the special qualities of the Cotswolds National Landscape (e.g. paragraphs 8.9.10 to 8.9.14) and concludes there would be no significant effects upon the Cotswolds National Landscape as a result of the Project. Due to the low lying nature of the main built elements of the Project (solar arrays), at a maximum height of 2.3 m, and with the Project largely following the natural contours of the landscape, no part of it would break the skyline. Therefore, long distance views towards Oxford would remain available from higher ground. It is acknowledged that these views would be interrupted by the Project, but it is considered that the inherent character of distant panoramic views would remain, within which built elements such as large overhead power lines and other development is commonplace.

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		result in the lowest potential for adverse effects. 3.4.7 Of the Eynsham Vale character area it states that the proximity to the Blenheim World Heritage Site could pose a particular constraint. Careful siting and design of schemes within this area are likely to be key to avoiding potentially unacceptable adverse effects and consideration of potential screen planting may be particularly important. The potential for the landscape to accommodate several developments before cumulative effects result in unacceptable change is likely to be limited. Representative Viewpoints & Visual Amenity 3.4.8 Representative views have been recorded across the study area and generally consider the relevant receptor's locations. However there are some locations and receptors where views have been recorded in less-than-optimal locations, for example between Bladon and Begbroke where the views recorded are not truly representative of the experience of those visual receptors, particularly in more sensitive landscapes, where views are sequential or transitional along public routes. Additionally, some visual receptors such as rail users have been excluded from the assessment with no explanation. 3.4.9 Of the 50 representative views recorded, only 31 have been visualised as AVR3 visualisations and there is no explanation for those selected. SBW consider that some of the views which have the most value to local people and represent a clear understanding of the local landscape character and the visual experience have not been rendered as a visualisation, for example Viewpoint 24. As previously set out, there are no representative views recorded from the RP+G. 3.4.10 Overall, the potential impacts on visual amenity are underestimated, particularly at Year 15, when mitigation planting has matured. Although the mitigation limits views of the proposals in many instances, this designed in mitigation alters the whole experience for the user of these routes. The LVIA lacks consideration of the value and intended experience from locations within the study area such as the approach to Bladon by road and public routes. The LVIA appears to find that simply reducing views of the proposal renders the impacts less than significant.	
RR-1007-031		Methodology 3.4.11 In August 2024 the Landscape Institute provided additional guidance on the 'Guidance on Landscape and Visual Impact Assessments' (GLVIA3) by way of Technical Guidance Note LITGN-2024-01 The LVIA does not consider the overlap of heritage and ecology in	GLVIA3 (LI and IEMA) refers to 'openness' once - in the context of perceptual landscape characteristics (paragraph 5.4). It is not part of visual impact. The Landscape Institute's position on this is reiterated in LI TGN-2024-01, at point 9(4) which, in response to the question "<i>How does LVIA relate to green belt and 'openness' issues?</i>" explains that "<i>As stated in GLVIA3 paragraph 5.4, 'openness' may be one of the aesthetic and</i>

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		accordance with this updated guidance. It is agreed that this is a separate specialist topic in ES terms however there are overlaps which are important to consider where relevant. It is also stated in the ES chapter that Green Belt is not specifically a matter for the LVIA (Page 23), however, this is contrary to guidance which sets out that where openness may be one of the aesthetic and perceptual qualities of the landscape it should be documented and addressed through the LVIA. 3.4.12 For the purposes of this assessment, it is set out that any effects with a significance level of Moderate or less are not considered to be 'significant' in terms of the EIA Regulations. However, guidance sets out that this decision should be justified in the methodology or receptor assessment. The assessment of significance is also judged before and after mitigation which allows the assessor to seek to reach a reduction in significance (pre mitigation a significant impact, post mitigation and not significant effect). This is not a recommended process. The mitigation is designed into the scheme and an inherent part of the overall proposals, and therefore the significance should not be judged without it in place.	<i>perceptual aspects of the landscape. Where this is the case, it would be documented and assessed as part of the LVIA. Green Belt is a planning policy designation and compliance with policy should be addressed separately to the LVIA."</i> The Applicant notes that this Relevant Representation acknowledges that LITGN-2024-01 (point 3(5)) clarifies the position on Moderate effects – that they can be deemed to be significant or not significant, with justification as to why a particular judgement has been made. The Applicant believes that the justification given in the LVIA is sufficient. As noted above in the response to RR RR-1086-7, neither the EIA Regulations nor GLVIA3, or subsequent landscape Institute technical guidance notes set out a formulaic/standard set of criteria / definitions for sensitivity, magnitude of impact or significance. The phrase 'significant in EIA terms' holds no specific meaning (GLVIA3, paragraph 3.32).
RR-1007-034		3.4.17 The Applicant at paragraph 8.14.4 states that the proposed planting would have a long-term benefit of reinforcing the landscape character of the local landscape. We disagree with the Applicant's claims.	The Applicant acknowledges the concerns raised in this Relevant Representation. However, existing and retained vegetation would preserve the inherent landscape structure of the landscape. This would be enhanced by proposed mitigation measures embedded into the design, as detailed at section 8.8 of the LVIA [APP-045] and shown on the Illustrative Masterplan [APP-062] . Over time this would reinforce and supplement the physical landscape characteristics of the local landscape.
RR-0964-2	Change in Use of Productive Agricultural Land	Loss of Amenity and Agricultural Land: Residents are apprehensive about the potential loss of amenity value due to the transformation of open fields into solar arrays. The development may also lead to the loss of productive agricultural land, which is a concern for the rural character and economy of the area.	Much of the Project Site will continue to be farmed, for conservation grazing, as described in the Project Description Chapter 6 [APP-043] and other areas provided for community food growing.
RR-0604-002		(2) The farmland is an asset in its own right that should not be lost on such a vast local scale.	As above, much of the Project Site will continue to be farmed, for conservation grazing, as described in the Project Description Chapter 6 [APP-043] and other areas provided for community food growing.
21. Legal			
105	n/a	Threat to planning integrity, opaque holding structure, and efforts to conceal Blenheim (powerful lobbyist) as the only real beneficiary,	Under section 31 of the Planning Act 2008, Nationally Significant Infrastructure Projects are required to be consented through a DCO. For Utility Scale Solar projects, such as the Proposed Development, if more than

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		while operating through affiliates posing as independent parties Project should not qualify as an NSIP due to the illegal aggregation of non-adjacent land plots; each individual project should be considered under a local planning process with proper input from local residents	50 Megawatts capacity is being generated it is captured as a Nationally Significant Infrastructure Project. On that basis, it would not be possible for the Applicant to seek consent for the Project through any other consenting process, such as the Town and Country Planning Act 1990. Local residents also have the opportunity to provide input through the DCO process. ES Chapter 5 - Alternatives Considered [APP-042] explains the size, location and extent of allotments considered, and why the land identified was considered most appropriate for the Project. While larger sites of contiguous ownership were preferred, these were not available in all cases and taking into account other site constraints.
903	n/a	I will mainly restrict my comments to the impact on the Lower Evenlode Valley [REDACTED] Mill Farm Lower Road: Restrictive covenants According to a private transfer agreement dated 11th July 2006 between the Blenheim Estate and ourselves, the owners of the land (Blenheim Estates) covenant to not build any structure on a specified area around Mill Farm. This area includes the whole of field 6.18 and the northern segment of field 8.06. (It also includes field 6-19 and plots 8-07 to 8-18 but these are in the flood plain and will not have solar panels.) Blenheim Estates therefore have no right to offer this land to PVDP for building solar panels. Although these fields are included in the Book of Reference in the DCO application as being subject to compulsory purchase of the rights, these fields are clearly not essential to the project and merely mean a slight reduction in the solar panel area, so should not be valid for compulsory purchase. The land in question should therefore be removed from the proposed solar panel area.	The Statement of Reasons [APP-021] sets out the basis on which both temporary and permanent rights over land are required for the Project. This includes the extinguishment, suspension or interference with private rights (such as land covenants) to the extent necessary to deliver the Project. All land within the Order Limits has been identified as required for the Project. The areas referred to have been identified in the Works Plans [APP-006] as potentially being required for a range of other components of the Project and not just Solar Panels, for example: • Ground Converter Stations • Electrical cables • Site establishment works • Fencing, gates, boundary treatment and other means of enclosure • Landscaping and biodiversity mitigation and enhancement measures • Various works for upgrading of footpaths or the creation of new Permissive Paths.
22. Local Community Suggestions			
119; 213; 221; 731; 975; 1073; 1105	Buffer Zones	The planned buffer zones are inadequate, and panels need to be moved further from properties.	Landscape and visual effects are assessed and reported in Chapter 8 [APP-045]. No significant effects are predicted during construction, operation or decommissioning of the Project. Of the 55 Representative Viewpoints assessed, there will be 12 major adverse at winter Year1. These effects would diminish over time, with no residual significant visual effects predicted at summer Year 15. The outline Layout and Design Principles document [APP-238] provides for buffers between existing settlements and the solar arrays. These measures, together with the significant new landscaping proposed, assist in reducing adverse visual effects and effect upon landscape character. The large amount of the Project area set aside for mitigation, flood risk, community growing and woodland planting is shown on the Landscape, Ecology and Amenities Plan [APP-228].
228; 267; 300; 334; 346; 366; 479; 530; 920; 921; 969; 986; 1022; 1073	Project size and ownership structure	Small solar farms, community owned solar farms and rooftop and car park panels should be preferred to large schemes such as Botley West.	The Applicant agrees that small-scale solar and rooftop solar panels are to be encouraged and are a contribution towards reaching the government's target of 70GW solar generation by 2025. This target will only be reached by constructing utility-scale solar farms like Botley West, not least because of the investment in National Grid infrastructure that comes with it. The Planning Supporting Statement [APP-225] paragraph 3.5.4 lists the

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			requirements of the Government’s energy policy as set out in British Energy Security Strategy (April 2022). This expects a five-fold increase in deployment of solar generation by 2035 – meaning that the UK must deploy 5.5 GW solar every year until. The Applicant acknowledges the suggestions raised by the community can play a key part in achieving the Governments targets in addition to Utility Scale Solar. The Applicant also acknowledges the desire for local ownership and is meeting Low Carbon Hub later this month to discuss this.
362, 530	Land Management	Blenheim Estate should be in charge of managing the land	The Outline Landscape and Ecology Management Plan sets the overarching vision for the Project and the principles to deliver coherent landscape and ecological features and management. The obligations within the document are secured through a requirement in the Draft DCO [APP-015]. The Applicant is lawfully responsible for ensuring the requirements of the DCO are implemented, but will be entering arrangements with a range of contractors and landowners regarding how specific aspects of the DCO will be managed. As part of this, the Applicant and Blenheim Estate have developed a Memorandum of Understanding that provides a framework for the input and involvement of Blenheim Estate in the management of the land and BNG plan.
853	Fire	The local Fire Service should be consulted	Oxfordshire Fire and Rescue Service did not respond to the statutory consultation nor did it submit a relevant representation. Should the project receive DCO consent, OFRS will be consulted. The Applicant will be required to carry out a Fire Risk Assessment and comply with the Regulatory Reform (Fire Safety) Order 2005.
530	Suggested changes to the Project	Project should have reduced panel area, no panels on BMV land, protection of the Palace WHS, enforcement of BNG commitments.	Landscape and Visual effects are assessed and reported in Chapter 8 [APP-045]. No significant effects are predicted during construction, operation or decommissioning of the Project. Of the 55 Representative Viewpoints assessed, there will be 12 major adverse at winter Year1. These effects would diminish over time, with no residual significant visual effects predicted at summer Year 15 Chapter 17 addresses agriculture, land use and public rights of way [APP-054]. It is concluded that there will be no overall significant effects arising from the project, and that the permanent loss of BMV land is small and not significant in EIA terms. Chapter 7 addresses the impacts of the project on heritage assets. [APP-044]. Harm to the significance of the Blenheim Palace WHS as a result of a change to its setting and to the character of the historic landscape where assessed and it was concluded that there will be no significant effects arising from the Project during all phases, Historic England agrees with the Applicant’s assessment. The management of the site is set out in the Outline Landscape and Ecology Management Plan [APP-235]. The obligations in the document are secured through a requirement in the Draft DCO [AS-009]. Prior to commencement of any part of the authorised development, a Landscape and Ecology Management Plan must be submitted and approved by the relevant Local authority: either West Oxfordshire, Cherwell or Vale of White Horse Districts. The LEMP will include the required monitoring and management arrangements, and the associated timetable and duration.

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23. Local Ecology and Nature			
4, 5, 13, 14, 16, 17, 26, 30, 33, 34, 35, 36, 54, 56, 58, 61, 63, 65, 70, 73, 75, 76, 84, 86, 89, 99, 119, 120, 124, 127, 128, 130, 138, 139, 141, 143, 145, 161, 162, 168, 169, 182, 184, 187, 188, 190, 192, 194, 198, 204, 207, 208, 214, 220, 226, 230, 231, 235, 237, 240, 242, 243, 246, 248, 250, 251, 252, 255, 260, 262, 264, 267, 269, 270, 271, 272, 277, 278, 279, 280, 281, 287, 294, 295, 296, 297, 298, 300, 301, 302, 303, 310, 317, 322, 327, 330, 331, 333, 334, 338, 340, 341, 342, 359, 363, 366, 380, 382, 385, 386, 388, 394, 401, 402, 403, 404, 405, 407, 408, 415, 420, 424, 425, 428, 429, 431, 432, 440, 441, 442, 443, 446, 448, 451, 452, 454, 455, 457, 461, 462, 463, 464, 466, 471, 474, 476, 478, 479, 481, 482, 487, 488, 489, 491, 493, 496, 497, 503, 504, 506, 508, 511, 514, 525, 526, 528, 531, 534, 536, 541, 542, 545, 546, 553, 554, 556, 560, 562, 564, 565, 569, 571, 572, 573, 574, 578, 580, 584, 585, 586, 589, 592, 595, 600, 601, 602, 608, 609, 611, 619, 621, 623, 627, 628, 630, 631, 634, 635, 638, 639, 640, 641, 644, 646, 651, 654, 667, 669, 677, 690, 691, 702, 711, 712, 717, 719, 723, 727, 731, 732, 733, 744, 748, 752, 753, 754, 755, 756, 758, 759, 763, 765, 770, 775, 782, 785, 786, 795, 797, 799, 801, 806, 808, 809, 810, 814, 819, 821, 827, 828, 831, 832, 833, 834, 837, 840, 845, 852, 861, 862, 865, 868, 874, 876, 878, 888, 893, 896, 897, 901, 902, 906, 907, 908, 910, 911, 913, 914, 915, 916, 917, 919, 923, 927, 930, 931, 934, 936, 938, 939, 941, 945, 948, 949, 950, 954, 957, 963, 969, 973, 976, 978, 979, 980, 984, 986, 990, 994, 995, 998, 999, 1003, 1009, 1010, 1011, 1018, 1021, 1023, 1026, 1029, 1030, 1040, 1044, 1047, 1048, 1052, 1059, 1060, 1063, 1077, 1078, 1080, 1081, 1087, 1088, 1093, 1095, 1096, 1105, 1113, 1115.	Ecological Impacts.	The project will cause ecological impacts, some of which may be detrimental to the local ecology.	The impacts of the project to all ecology and nature conservation receptors are assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. This has been informed by a range of ecology surveys, presented in ES Volume 3, Appendix 9.1-9.14 [APP-150-163]. A summary of the impacts of the project on ecology and nature conservation receptors is presented in ES Volume 1, Chapter 9, Section 9.16 [APP-046], outlining both negative and positive impacts to ecology receptors. It is not possible for an Environmental Statement to consider effects on every potential ecological receptor, nor would that be a proportionate approach to the EIA. The assessment focusses on those receptors where there are likely significant effects. The list of receptors has been agreed with Natural England. Project impacts will be mitigated by a comprehensive package of embedded mitigation, as outlined in ES Volume 1, Chapter 9, Section 9.8 [APP-046]. Embedded mitigation measures will be implemented under various management plans, outline versions of these plans include the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235], Outline Code of Construction Practice (OCocP) [APP-232-233] and Outline Decommissioning Plan (oDP) [APP-236]. Embedded mitigation will be secured in the Development Control Order (DCO) [AS-009]. No additional mitigation was considered necessary for any of the ecology receptors.
64, 89, 112, 119, 169, 204, 208, 235, 243, 248, 260, 272, 285, 288, 290, 296, 297, 313, 333, 334, 341, 342, 359, 366, 384, 388, 394, 404, 442, 457, 467, 474, 489, 491, 496, 497, 502, 542, 546, 551, 553, 554, 560, 571, 589, 606, 619, 633, 634, 644, 685, 690, 702, 719, 731, 736, 753, 808, 812, 814, 821, 823, 829, 852, 865, 896, 919, 924, 927, 934, 935, 938, 949,	Barrier Fencing.	Barrier fencing will impact local connectivity and dispersal, cutting off the project from wildlife, especially deer.	The impacts of the barrier fencing has been assessed to all ecology and nature conservation receptors as the impact of habitat severance within the Botley West Solar Farm contained within ES Volume 1, Chapter 9, Section 9.9 [APP-046]. The fencing will be for operational security purposes and may be up to 2.1 m in height. The security fencing will be designed to be permeable to small mammals including badgers, dormice, otter, hedgehog, brown hare, rabbit and fox.

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960, 969, 973, 990, 995, 996, 1003, 1023, 1047, 1056, 1060, 1077, 1088, 1105.			It is not considered that barrier fencing will measurably impact on receptor species of bird, bat, amphibian or reptile as such species can freely pass through it. As deer are wide-ranging in their habits and movements, it is not considered that significant changes in deer movements will be brought about by perimeter fencing. Furthermore, local deer species are not of conservation concern, as such are not considered as an ecology and nature conservation receptor. The process by which such receptors were selected followed good practice guidelines (CIEEM 2023) and was agreed with Natural England.
26, 67, 136, 139, 264, 272, 313, 340, 388, 446, 466, 473, 496, 509, 551, 641, 888, 949, 1009, 1023, 1077, 1093, 1111, 1113.	Bird death risk by the 'lake effect'.	Birds will mistake the solar panels for water causing them to collide with the panels causing injury or death.	The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [APP-046] . Although the lake effect may be possible, a review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. Research in the United States found some evidence that such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations and no evidence has been published demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping <i>et al.</i> 2025).
18, 84, 87, 119, 139, 161, 190, 204, 208, 235, 242, 252, 255, 271, 280, 287, 292, 303, 310, 342, 383, 384, 386, 388, 404, 451, 467, 474, 482, 491, 496, 522, 553, 558, 571, 579, 585, 589, 595, 599, 639, 641, 644, 649, 651, 691, 719, 723, 731, 753, 758, 822, 832, 853, 896, 899, 908, 910, 931, 938, 939, 949, 960, 965, 969, 973, 1003, 1023, 1041, 1044, 1056, 1080, 1088, 1105.	Farmland birds.	Farmland bird's habitat, including skylark, will be destroyed by the project and will reduce the availability of food sources. Skylark plots don't work.	The impacts of the project on farmland birds of conservation concern has been undertaken in conjunction with wintering and breeding bird assemblages within ES Volume 1, Chapter 9, Section 9.9 [APP-046]. These were informed by wintering and breeding bird surveys presented in ES Volume 3, Appendix 9.9 [APP-158]. The combination of new species-rich grasslands (including areas managed specifically for birds), enhanced floodplain meadow along the River Evenlode and significant new hedgerow and woodland planting will provide large areas of habitat for farmland birds. Skylark plots are included in the masterplan in order to provide skylarks with access to additional foraging habitats throughout their breeding season. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Outline management measures of skylark plots is provided in the Outline Landscape and Ecology Management Plan (oLEMP) [APP-235]. The locations of meadow areas (areas of archaeological interest), skylark plots, new and enhanced hedgerows, woodlands and the River Evenlode landscape scale corridor are displayed in the Landscape, Ecology and Amenities Layer Plan [AS-022] and Illustrative Masterplan [AS-020].
26, 67, 89, 136, 138, 139, 143, 161, 204, 237, 242, 243, 255, 260, 271, 272, 280, 287, 288, 292, 310, 366, 386, 388, 404, 407, 443, 466, 474, 496, 503, 509, 551, 554, 586, 632, 644, 651, 691, 755, 782, 797, 814, 852, 868, 888, 938, 949, 1009, 1044, 1048, 1077, 1111, 1113.	Wintering birds.	The project will impact wintering birds, with their habitat permanently lost.	Project impacts to wintering birds are assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. These were informed by wintering bird surveys presented in ES Volume 3, Appendix 9.10 [APP-159]. The assessment parameters included all bird species afforded special statutory protection, or those included on one, or more, of the lists of species of conservation interest. A number of these species were recorded

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			within the project site. Evaluation of the significance of these assemblages are presented in ES Volume 3, Appendix 9.10, Section 4.2 [APP-159]. The net loss in area of foraging opportunities for those species relying on an arable landscape was acknowledged, albeit mitigated by a combination of new species-rich grasslands (including areas managed specifically for birds, both wintering and breeding), enhanced floodplain meadow along the River Evenlode and significant new hedgerow and woodland planting. The geese shown on Countryfile episode Winter Wonders (BBC 1 5th January 2025) are snow geese <i>Anser caerulescens</i>, these geese were identified during wintering bird surveys presented in ES Volume 3, Appendix 9.10 [APP-159]. Snow geese are not listed as a species of conservation concern, nor are they specially protected beyond the protection afforded to all wild birds.
18, 87, 89, 119, 124, 139, 161, 190, 204, 208, 231, 237, 242, 255, 269, 272, 288, 292, 298, 322, 340, 386, 388, 394, 407, 464, 466, 474, 478, 479, 491, 526, 542, 553, 554, 574, 579, 595, 617, 632, 690, 691, 702, 731, 748, 755, 797, 819, 822, 868, 888, 906, 910, 949, 960, 969, 973, 979, 1003, 1056, 1058.	Bats	Bats will be impacted by the solar panels themselves.	Impacts to bat assemblages as a result of the proposed solar panels are assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. The implications of recent research (eg Tinsley <i>et al.</i> 2023; Szabadi <i>et al.</i> 2023) on 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 Volume 3, Appendix 9.4 [APP-153]. Additional consultation with Natural England is on-going and will be reported within a bat technical note. The note will include full details of additional survey work being completed along with details of buffers to be implemented.
242, 262, 280, 464, 465, 536, 542, 611, 893, 896, 901, 1003, 1056, 1088.	Designated Sites	Designated sites will be impacted by the project.	The impact of the Project on surrounding designates sites is assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. For European Protected Sites, a Habitat Regulations Assessment Report (HRAR) was undertaken, presented in ES Volume 3, Appendix 9.14 [APP-163]. The conclusion of that work was that there would be no significant impact to designated sites as a result of the Project. This conclusion was supported by Natural England in their Relevant Representation [RR-0761]. A number of best practice mitigation measures will be implemented to ensure the protection of designated sites. These will be implemented under various management plans, outline versions of these plans include the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235], Outline Code of Construction Practice (OCoCP) [APP-232-233] and Outline Decommissioning Plan (oDP) [APP-236]. These plans are part of the project's embedded mitigation, which will be secured in the Development Control Order (DCO) [AS-009].
255, 310, 313, 464, 465, 496, 522, 530, 542, 558, 567, 579, 606, 637, 804, 822, 853, 939, 960, 1026, 1028, 1061.	Landscape Management and Monitoring	There are a lack of landscape management and monitoring details available. The landscape won't be managed properly by the project. There is no commitment to the management of the landscape.	The landscape and ecology strategy is set out in the Outline Landscape and Ecology Management Plan (oLEMP) [APP-235]. Habitat creation as a result of the project will include circa. 100 ha of new floodplain mosaic habitats along the River Evenlode corridor, 26.5 km of new species rich hedgerow, 22 km of enhanced hedgerow, 15 ha of woodland, wildflower grasslands, mixed scrub habitats and grasslands within solar arrays to be managed for conservation value. More details of habitat specifications, their maintenance and monitoring are provided in the oLEMP [APP-235] and can be seen visually in the Landscape, Ecology and Amenities Layer Plan [AS-022].

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			Further to Biodiversity Net Gain (BNG) habitat and hedgerow unit gains, the scheme will be managed to increase the value of habitat to interest species by including specific enhancements including log piles, bee hives, bat boxes and bird boxes [APP-235]. The oLEMP is part of the Project's embedded mitigation and will be secured in the Development Consent Order (DCO) [AS-009].
18, 161, 246, 255, 260, 276, 280, 297, 313, 478, 542, 546, 579, 617, 632, 644, 653, 683, 732, 853, 896, 919, 936, 938, 949, 1003, 1056, 1071, 1093.	Mitigation	Ecology mitigation is inadequate.	Following the assessment of project impacts on ecology receptors [APP-046], appropriate mitigation measures were committed to ensure that, overall, the Project delivers a net benefit for ecology, in line with local and national policy. The approach to mitigation is presented in ES Volume 1, Chapters 9, Section 9.8 [APP-046]. Mitigation will be implemented under various management plans, outline versions of these plans include the Outline Landscape and Ecology Management Plan (oLEMP) [APP-235], Outline Code of Construction Practice (OCoCP) [APP-232-233] and Outline Decommissioning Plan (oDP) [APP-236]. These embedded mitigation measure will be secured in the Development Consent Order (DCO) [AS-009].
464, 467, 496, 503, 585, 611, 641, 736, 756, 798, 804, 910, 980, 990, 994, 1003, 1023.	Long Mead Meadow Local Wildlife Site	Long Mead Meadow Local Wildlife Site should be avoided by the project.	The design of the Project has been modified since the Preliminary Environmental Information Report to ensure that the Horizontal Directional Drilling (HDD) process under the River Thames avoids the Swinford Crossing and Long Mead sites, as well as passing underneath the flood meadows alongside the river. Current plans have launch and rise in existing arable land.
24, 63, 112, 168, 189, 198, 204, 207, 208, 246, 272, 286, 288, 292, 310, 343, 362, 383, 386, 393, 394, 465, 467, 496, 503, 504, 506, 522, 558, 567, 586, 589, 596, 599, 638, 711, 723, 732, 736, 748, 770, 814, 853, 859, 872, 938, 939, 949, 960, 963, 996, 1019, 1026, 1028, 1044, 1083.	Biodiversity Net Gain	Claims that the project will increase biodiversity are misleading. Simply changing land from farming to solar panels won't increase biodiversity. The project will not deliver a biodiversity net gain.	Delivering a BNG is not currently required for NSIPs, though the Applicant notes that DEFRA is currently consulting on the proposed mandatory minimum 10% delivery of BNG for NSIPs to be introduced from May 2026. Irrespective of this, the Applicant is proposing to commit to delivering well in excess of the minimum 10% uplift in BNG. The calculation of the Project's Biodiversity Net Gain (BNG) is set out in the Biodiversity Net Gain Assessment, provided in Volume 3, Appendix 9.13 [APP-162]. The Illustrative Masterplan for the Project in Volume 2 of the ES [APP-062] has been designed with the aim of achieving a gain of at least 70% Habitat BNG. The method accepted by Natural England for assessing BNG is by using DEFRA's Statutory Biodiversity Metric Tool and Statutory Biodiversity Metric Condition Assessments (DEFRA, 2024). The metric assesses the biodiversity value of habitats pre- and post-development based on habitat type, distinctiveness, and condition. A biodiversity index is derived from the baseline and proposed development scenario. The approach to and justification for the target of 70% habitat net gain is set out in ES Appendix 9.13 Biodiversity Net Gain Statement [APP-162]. The key driver for the onsite BNG is the change from much of the site being intensive arable to higher biodiversity value conservation-managed grasslands. Furthermore, preliminary calculations of hedgerow units provide a BNG of more than 50%. A mounting body of scientific evidence is demonstrating solar farms that are managed for biodiversity support a greater assemblage of flora and fauna. The outline maintenance and monitoring of BNG landscape elements of the site is set out in the Outline Landscape and Ecology Management Plan

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			(oLEMP) [APP-235] . The oLEMP is part of the project's embedded mitigation and will be secured in the Development Consent Order (DCO) [AS-009] .
478, 711, 852, 1093.	Microclimate changes.	Microclimate changes as a result of solar panels will significantly impact ecology.	Microclimate changes as a result of solar panels are well studied with effects including lower surface temperature, lower light and higher humidity. Such changes will have corresponding influences on the botanical interest beneath the panels which is considered within ES Appendix 9.13 Biodiversity Net Gain Statement [APP-162] through the assumption of a poor condition grassland developing beneath the panels. However, effects are not considered likely on other ecology receptors identified within ES Volume 1, Chapter 9, Section 9.6 [APP-046] .
201, 235, 243, 251, 252, 298, 482, 497, 589, 619, 691, 719, 732, 814, 888, 908, 949, 969.	Noise and lighting	Noise and Lighting impacts will significantly impact ecology.	The impacts of noise and lighting are assessed for all ecological receptors in ES Volume 1, Chapter 9, Section 9.9 [APP-046], outlining no significant impacts are likely to ecology receptors. Noise impacts have been assessed in ES Volume 1, Chapter 13 [APP-050]. Details of proposed lighting are provided in ES Volume 1, Chapter 6, Section 6.4 [APP-043]. The impacts of noise and lighting during construction, operation and decommissioning will be mitigated by a number of best practice measures as set out under various management plans. Outline versions of these plans include the Outline Landscape and Ecology Management Plan (oLEMP) [APP-235], Outline Code of Construction Practice (OCoCP) [APP-232-233], Outline Operational Management Plan (oOMP) [APP-234] and Outline Decommissioning Plan (oDP) [APP-236]. These embedded mitigation measure will be secured in the Development Consent Order (DCO) [AS-009]. Furthermore, a sensitive lighting strategy to minimise the impacts of lighting on ecology receptors in accordance with the Institute of Lighting Professionals/ Bat Conservation Trust guidelines will be implemented during construction as outlined in the Outline Code of Construction Practice (oCoCP) [APP-232-233], secured in the Development Consent Order (DCO) [AS-009].
RR-0164-018 (Cherwell District Council)	Birds.	The sites support a large assemblage of breeding and wintering birds many of which are red list, Priority or protected species. Whilst the CDC's Ecologist understands from the text that areas of archaeological importance would be managed as grassland to benefit species associated with farmland, they could not tell the extent of this area and whether it would offer sufficient opportunity to offset the loss of habitat to these birds and other farmland species such as Brown hare. The timing of cutting of grassland should not include April if the intention is to provide skylark nesting habitat. The purpose of the proposed skylark plots (11.6 of oLEMP) seems unclear. They do not fit in with the description and management for AB4 of the Countryside stewardship and management as stated. Skylark plots are known to be successful in supporting skylark numbers when provided in areas with an open aspect - which a field of solar arrays would not really provide. Leaving areas unsown within the grassland around the arrays is	The locations of areas of archaeological interest are displayed in the Illustrative Masterplan [AS-020]. They cover an area of circa 36ha and will offer a permanent resource of grassland managed for both wintering and breeding birds. Section 8.7 of the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235] sets out the mitigation measures with respect to breeding bird (including skylark) with respect to grass cutting, specifying (8.7.3) that such cutting would take place in autumn to allow birds to finish breeding. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species.

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		unlikely to perform the same function as undrilled areas in winter crops (which ensure there are areas which are not too dense or high for skylarks to access). Skylark will nest and forage in grassland if the sward is not too high although this is unlikely in an array field. The Council requests that evidence of the efficacy of leaving 5mx5m bare plots in solar array fields, in mitigating for losses to farmland birds, is included in the justification.	
	Bats.	An assemblage of bats of National importance, including two Annex II species utilise the woodlands and intervening habitats adjacent to, within and across the site for roosting (including maternity), foraging and commuting. There is currently only brief information on how these bats could be impacted. There is no assessment of whether the scale of the proposals, with large areas of solar arrays, could have a discouraging impact on the movement and foraging of these bat species. The Council requests that more information on this aspect be required to provide certainty that these species would not be negatively affected.	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: - additional static detector recording (including in-field data); - full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and - full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.
	Ancient woodland.	The mitigation measures state a minimum of a 15m buffer will be retained to ancient woodland areas in line with NE guidance however it should be noted that The Woodland Trust recommends a 50m buffer (Planning for ancient woodland: planners manual for ancient woodland and veteran trees, July 2019) unless otherwise justified. To reduce the chance of edge effects on woodlands a larger buffer should be considered wherever possible.	The minimum 15 m buffer to ancient woodland will be implemented in accordance with government guidance (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions). It should be noted that this is the minimum distance to be adopted; in many locations the buffer to ancient woodland would be considerably larger.
	Biodiversity Net Gain.	A biodiversity metric in full has not yet been submitted. This would be a very large document and so the Council do not object to a summary however a full metric (perhaps split by area) should be submitted to LPAs at some stage so it can be appropriately assessed. If there are ditches on site then watercourse units should be calculated. CDC's Ecologist would also propose that the river corridor is included within the calculations of watercourse units due to its proximity to the site.	The Statutory Biodiversity Metric (DEFRA, 2024) is completed and appended to Appendix 9.13 Biodiversity Net Gain Assessment [APP-162]. In consultation with Natural England, the watercourse section of the metric will be assessed and completed for all watercourse associated units on the project site.
RR-0308-002 (Environment Agency)	Water vole and surveys.	Issue:	Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and

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		The impacts on protected species are not understood. Species-specific water vole and otter surveys have not been completed. Impact: The applicant does not provide enough evidence to assess the likely negative effects on riparian mammals. The purpose of ecology surveys is to provide baseline information presence/absence, utilisation of habitat, etc.) to determine whether a project will have a negative impact on a protected species, and to inform whether mitigation is required. Solution: Conduct otter and water vole surveys to establish the presence or absence of said species, the potential risks and any mitigation and compensation required. The surveys should follow best practice guidelines. The development should also consider potential enhancement opportunities for the species within the design. For example, potential enhancement may include habitat improvements or connectivity of the riverine corridor through the development. Table 9.10.1 should also be updated following otter and water vole surveys if evidence of shelters are discovered, as both species may need to be monitored as part of a mitigation Licence. Additional Comments: The provision of a buffer alone is not enough to avoid potentially negative impacts to otters and water voles, due to the potential to disturb either species during construction on or near watercourses (e.g. installing watercourse crossings, riparian enhancement works, etc.). In addition by law its an offence for Riparian mammal shelters (burrows, holts and couches) are protected from disturbance.	Biodiversity [APP-046], otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact. This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean et al 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced.
	Loss of habitat- water vole.	Issue: Assessment of effects section does not include an assessment of the impact of temporary and permanent habitat loss during construction and decommissioning on water vole. Impact: Lack of consideration regarding the sensitivity of water voles to impacts during the construction and decommissioning stages, There are multiple records of water voles on main rivers and ordinary	As set out in section 9.6.77 of ES Chapter 9 Ecology and Biodiversity [APP-046], the potential presence of water vole on the Project site is considered by virtue of the consideration of their habitat within the impact assessment (i.e. water courses and water bodies). All such habitat that could be used water vole within the Project site is to be maintained with an appropriate buffer and will be protected during both construction and decommissioning. As such, there would be no impacts to water vole during these phases of development.

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		watercourses that are connected to the site (e.g. Rowel Brook). Solution: Amend Section 9.9 to consider the impact of construction and decommissioning on water voles.	
	Statutory Biodiversity Metric.	Issue: The BNG assessment is incorrect, The baseline habitat scores have only been calculated for on-site area and hedgerow habitats. Impact: Watercourses within the Scoping Boundary have not been assessed as part of BNG, on the basis that “none are being impacted by the project” (Section 9.1.6 oLEMP), even though watercourses may be impacted during the construction and decommissioning phases (e.g. installation of crossings, riparian works, etc.). There is also a lack of ambition with regards to leaving a measurably positive impact on watercourses following the development. Solution: Measure watercourse lengths within the scheme and use the watercourse metric to calculate baseline habitat scores and propose to achieve a BNG target of at least 10% for watercourses. Additional Comments: For potential BNG opportunities, we recommend the applicant refers to both the mitigation measures within the Water Framework Directive and opportunities identified within any Local Nature Recovery Strategies.	The Statutory Biodiversity Metric (DEFRA, 2024) is completed and appended to Appendix 9.13 Biodiversity Net Gain Assessment [APP-162]. Appendix 9.13 will be updated to include the watercourse section of the metric which will be assessed and completed for all watercourse associated units on the Project site.
	In-channel habitat enhancements.	Issue: Proposal to maintain existing river corridor habitat within Zone 2 (Evenlode Corridor), including marginal and aquatic planting. Impact: Not ambitious enough to only consider the riparian habitat. Proposal only appears to be focus on the River Evenlode, despite other watercourses be present within the scheme boundary (e.g. River Thames, Limb Brook, Chil Brook, etc.). Solution: The proposal needs to include in-channel habitat enhancements measures. This could be achieved through increasing the in-channel habitat diversity,	The delivery of the Evenlode Corridor will provide over 100ha of wet grassland habitat and other riparian features. The Project order limits do not include the River Evenlode channel itself and, as such, works within the channel are not being considered as part of the Corridor enhancement.

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		improving channel morphology and removing barriers.	
RR-0308-003 (Environment Agency)	Biodiversity net gain monitoring.	Issue: Monitoring and inspection section includes a plan to conduct river condition assessments, to “ensure that the assumptions with respect to biodiversity net gain were being achieved.”. Impact: The statement is contradictory to Section 9.1.6, which states that BNG is not being delivered for watercourses. Solution: Whilst we support the delivery of river condition assessments, we encourage that these are done with a plan to deliver watercourse BNG enhancements.	The Statutory Biodiversity Metric (DEFRA, 2024) is completed and appended to Appendix 9.13 Biodiversity Net Gain Assessment [APP-162]. Appendix 9.13 will be updated to include the watercourse section of the metric which will be assessed and completed for all watercourse associated units on the Project site.
RR-0308-004 (Environment Agency)	Watercourse buffer zones.	Issue: The majority of watercourses will have a minimum buffer of 8m maintained during works to protect the feature. Impact: Buffer strips less than 10m are not effective at allowing space for commuting by mammals and the maintenance of a natural river corridor. Solution: Riparian buffer strips measure a minimum of 10m from the bank-top for all watercourses on the site, unless existing physical constraints prevent this, and that this is defined in the Outline CoCP. This will allow for the natural river corridor to be maintained and free movement of riparian mammals up and down the system.	The use of 8m minimum buffers with respect to most watercourse through the Project is standard best practice with respect to such features. As such, this has been adopted, where it is possible to do so. This includes both within the illustrative masterplan as a design principle and also during construction to protect these features. The provision of these buffers is set out in section 8.2 of the oLEMP [APP-235] and section 1.10.12 of the outline Code of Construction Practice [APP-232].
RR-0308-005 (Environment Agency)	Vibrational Effects on Fish.	Issue: Fish have not been included in the assessment of the construction of the cable route corridor which is proposed to cross the River Evenlode and River Thames. Impact: Although Horizontal Directional Drilling is less impactful than open trench cable laying, there is still the potential for continuous noise associated with vibrations from the drilling to impact on fish species in the River Evenlode and River Thames, especially where it has been proposed to last up to one year.	Even for the longest HDD under the River Thames, the period the drilling would be near or under the river would only be circa 2 weeks. As such, any vibration impact would be very short term. Notwithstanding this, at this stage, the final depths of the HDDs to be used to cross water courses has not been determined as the ground conditions are not yet known. As set out in section 3 of ES Appendix 6.2 Cable Laying Methodology and HDD Crossing Locations [APP-130], the depth of the HDD could be between 1.5 and 30m. The final depth will therefore be chosen to ensure that there are no potential vibration impacts to water courses once the ground conditions (and therefore transmission of vibration) has been determined.

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		Impacts from noise and vibration are more likely where the drill depth is relatively shallow. Impacts on fish from noise lasting up to a year could result in fish avoiding key lifecycle habitat and thus impact on long term recruitment. Solution: An assessment on fish species from the impacts of any noise during the cable laying must be detailed in the ES. Where necessary mitigation measures should be included to make any impacts negligible and detailed in the OCEMP and CEMP. This may involve a timing restriction to avoid any key spawning or migratory periods and/or drilling to a greater depth to ensure a sufficient buffer. Additional Comments: Underwater noise or vibration may affect natural migratory fish behaviour and in extremities, kill fish. If it is assumed that noise and vibration from HDD is negligible to fish, then this needs to be backed up with evidence. Guidance on assessing the impacts on fish can be found in Sound Exposure Guidelines for Fishes and Sea Turtles (Popper et al., 2014). These guidelines provide recommendations for setting criteria (including injury and behavioural criteria) for fish. HDD would class as a continuous noise source for fish.	
	Electromagnetic Fields- fish.	Issue: Fish have not been included in the assessment of the operation of the cable route corridor which is proposed to cross the River Evenlode and River Thames. Impact: Electromagnetic fields (EMFs) emitted from high voltage cables can have behavioural impacts and impacts on fish egg development. Solution: Appropriate measures are to be put in place by the developer, so that EMFs are not detectable by fish from the installation of underground cables. Additional Comments: Studies have found EMF's can affect individual organisms during embryonic and larval stages. Lamprey spp. (present in the River Thames and Evenlode), spend their juvenile stages on the bed of the river (normally in silty areas). As such this could lead to localised impacts on any fish near the power cables, where there could be an increase in	All cables will be appropriately shielded typically using metallic sheaths or armouring as per industry standards to prevent increase in EMF.

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		EMF. Additionally, the behaviour of migratory species (brown/sea trout, European eel) present in the River Thames and Evenlode may be impacted by any increase in EMF. It is noted that shielding of cables and depth of cables under the watercourse may offer suitable mitigation.	
RR-0308-023 (Environment Agency)	Legislation.	Volume 1 Chapter 9: Ecology and Nature Conservation: 9.2: Environmental legislation does not list some recent (2024) legislation pertaining to BNG. The following should be included: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, for completeness.	Volume 1 Chapter 9: Ecology and Nature Conservation: 9.2 [APP-046] has been updated to include Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.
RR-0761-001 (Natural England)	Designated Sites	Internationally Designated Sites Two internationally designated sites have been identified as subject to potentially likely significant effects from this proposal. We agree the scope of the HRA Screening exercise was appropriate. Cothill Fen Special Area of Conservation (SAC) Natural England agree with the conclusions within Environmental Statement (ES): Appendix 9.14 Habitats Regulations Assessment (HRA) Report (November 2024) [APP-163] on Cothill Fen SAC. The site is screened out from further HRA. Oxford Meadows SAC Air Quality In our Section 42 Consultation Response we raised the issue of air quality impacts (section 1.2.1). We note that an in-combination assessment has now been completed and is presented in Chapters 12 and 20 of the ES. The HRA concludes (paragraph 4.4.11) that the peak change in AADT remains below the screening threshold. Subject to the securing of measures set out in the oCoCP (paragraphs 5.2.4, 5.2.5, 5.3.2), we agree that it is likely there would be no adverse effect on the integrity of Oxford Meadows SAC. Your authority, as competent authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), should undertake an Appropriate Assessment of the proposal, in accordance with Regulation 63 of the Regulations. We would be pleased to review the detailed mitigation measures within the oCoCP as it is developed. Natural England is satisfied that 'green' issues are unlikely to result in adverse effects on the integrity	Internationally Designated Sites Noted. Cothill Fen Special Area of Conservation (SAC) Noted. Oxford Meadows SAC Noted. Nationally Designated Sites The assessment of SSSI's within Chapter 9 of the ES [APP-046] will be updated as per the request.

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		of internationally designated sites, subject to delivery of the project in line with the presented design and evidence. Nationally Designated Sites Enivronmental Statement Chapter 9 (November 2024) [APP-046] contains an assessment of impacts to ecology and biodiversity, including on Nationally designated sites. There are a large number of Sites of Special Scientific Interest within close proximity of the development proposal. These sites are presented in Table 9.6.2 in Chapter 9 of the ES. We note that this table has a column labelled 'relevant qualifying interest' when in fact this column shows the designation classification. Our previous Section 42 Consultation Response highlighted the need for a full assessment of impacts to SSSIs, showing which sites had been considered, their interest features, potential impact pathways and any mitigation measures. For most of the SSSIs listed, the qualifying interest features are not fully identified or set out. The assessment is not presented in a way which examines each individual SSSI, but it does consider the relevant pathways of impact to the SSSIs. A summary table or additional column to Table 9.6.2 which showed the results of the assessment for particular sites would be helpful. Natural England agree with the conclusions of the assessment of impacts to SSSIs.	
RR-0761-002 (Natural England)	Protected bat species.	Areas of the proposal are particularly important for Bechstein's and Barbastelle bats which are a protected species under the Habitats and Species Regulations, 2017 (as amended). The ES largely recognises the importance and sensitivity of these species, and impacts through 'habitat severance' are considered in paragraph 9.9.774 but this is not very detailed. In particular there appears to be a reliance on a precautionary assessment that the habitat is valuable, but will not be impacted due to embedded mitigation measures. However, there is a dearth of specific information on the delivery, management and monitoring of these mitigation measures. Whilst the overarching objective to increase biodiversity of the site and bring much more of the site into a nature conservation-led management plan is welcomed, and should improve the value of the site for wildlife, there are some points of clarification required regarding the existing	Each point addressed below.

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		ecological value of the site, especially in terms of its value for bats and the effectiveness of proposed mitigation.	
RR-0761-003 (Natural England)	Bat Survey Approach.	We understand that the approach taken has been to sample some key landscape features in order to gain an understanding of the general level of bat activity and likely assemblage present. The number of sampling points (static detector locations) and the survey methods used (no in-field static detector locations/paired sampling, no onsite transects, and only limited information obtained from the radio tracked bats) have not allowed for a thorough understanding of how bats currently use the site, or a robust baseline. The bat surveys have not been comprehensive enough to identify key flight lines, key foraging areas, or identify hedgerow tree and woodland edge roosts to inform the design sufficiently to avoid the risk of affecting bats' use of these important areas. Although radio tracking was undertaken this was only used to locate roosts, with no regular over-night tracking of locations and activity to provide data on how those tagged bats are moving through and utilising the landscape. Of the data that has been obtained, although brief descriptions of static detector locations have been provided (Bat Survey Report [APP-153] Tables 2.1 and 2.2), Figures 2.1 and 2.2 are of such low resolution over a large scale that it is not possible to see the exact location of the sampling points and the habitat areas, linkages or corridors that were surveyed. None of the data obtained from undertaking woodland transects and statics appear to have been reported, and the Preliminary Bat Roost Assessment (as referenced in para 9.4.27 of Chapter 9 of the Environmental Statement) has not been submitted to the document library. The trapping and radio tracking data is only briefly described with no data available on which bats were trapped where and when, presence of juveniles, where each individual bat was radio tracked from and to, or the timing/synchronicity of roost emergence counts. All of this vital additional data would help to give context on how important the area is for bats and gain better understanding of the bats that utilise the site. For example, the unusually high numbers of 'big' bats trapped in woodland locations (30 noctule, 2 serotine and 3	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: additional static detector recording (including in-field data); full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going. Updated Figures 2.1 and 2.2 ES Appendix 9.4 Bat Survey Report [APP-153] at a higher resolution to be provided in the bat technical note. Full data with respect to the radio tracking to be provided in updated bat technical note. Such data have been presented to Natural England in a

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		Leisler’s) may give important insight into their presence locally, or high numbers of Natterer’s, if trapped in one location in autumn, could suggest swarming, but such generalised data does not allow for anything but generalised interpretation. No detailed information on methods for roost characterisation or emergence counts has been provided and it is not clear whether counts were made consecutively or simultaneously and no inference on aspects such as roost switching or fidelity can be made. Likewise, identification of maternity roosts from post-lactating females outside of the maternity period may also be misleading. Hundreds of bats were trapped and those fitted with radio transmitters were ringed, however no further mention of encountering or not encountering ringed bats is made. Given how extensively the bats in the wider area are studied (e.g. August et al 20142, and Wytham Bat Project), it is interesting that no ringed bats were encountered during the trapping conducted, or this may be an omission in reporting. Natural England welcomes the conclusion that the mosaic of habitats within the Zone of Influence is considered to be of ‘at least national importance’ to bats. However, species-poor fields, and open habitats should not automatically be considered of low habitat value to bats, especially as no in-field bat survey data has been obtained for any of the habitats present. It has not been reported whether the presence of field margins currently managed for nature conservation, areas of higher plant species diversity such as expanses of ruderals or hay-cut grassland, or existing damp/ephemerally wet areas have been surveyed for or related to bat foraging activity. Water (Entwistle et al., 2014) especially can increase insect numbers, hence benefit foraging bats. It is also worth considering the species assemblage known to be present within the site (barbastelle, Leisler’s, Nathusius’ pipistrelle, noctule, serotine, common pipistrelle, soprano pipistrelle, brown long-eared, and Myotis spp.), all of which are known to forage (at least occasionally) in open space, and all UK bat species are capable of commuting across open space when fully dark.	summarised form during on-going engagement post submission and are the subject of on-going discussions between the Applicant and Natural England. Background data from the Wytham Bat Project has been obtained and will be described in the bat technical note. Bats ringed through that project were encountered within trapping in Wytham and in the Southern Site Area during the trapping completed in 2024. No other location across the Project caught bats ringed in Wytham The Project incorporates significant new, high-quality bat foraging habitat in the form of the River Evenlode Corridor, woodland, enhanced hedgerows and associated buffers. Areas where existing field margins occur will be incorporated into the buffers to be created along hedgerows. Further static monitoring data collected in 2024 will be submitted within the bat technical note. This includes data from in-field monitoring points to illustrate their use or otherwise by the existing bat population. These data will be used to help inform the overall area of buffers required for bats and associated foraging resource. The full data set will then be linked to existing and proposed habitat resource
RR-0761-004 (Natural England)	Project Design.	The bat survey data that has been obtained does not appear to have informed the design in any specific locations, except the retention and	The masterplan is illustrative and there is an existing commitment to incorporate appropriate buffers to all important bat flightlines (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129]

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		enhancement of the River Evenlode corridor. Yet, significant habitat creation and enhancement linking this potentially important riparian area with other areas of potential (and confirmed) importance such as woodlands, smaller copses and other riparian habitats, as well as known roosts, is not explicit in the design. It is also noted that static detector surveys indicated that another survey location (S7) supported a similar average level of bat activity as this riparian feature in 2023, which is not reflected in project design. Where hedgerows are to be 'reinforced' or larger buffers proposed (wider than the proposed 5m standard), this appears to be largely along public rights of way, access routes or some boundaries of the overall development area; these non-developed areas with larger buffers and greater habitat provision have not been specifically located along existing features or routes utilised by bats, or to connect with or buffer known roosts and potential areas of supporting habitat. Paragraph 8.5.1 of the Outline Landscape and Ecology Management Plan (oLEMP) [APP-235] states that 'The Project will incorporate appropriate buffers either side of any important bat flight line, as identified by radio tracking studies of the Project Site. Such buffers will not include any solar infrastructure and are to ensure that bats can use the landscape unhindered by any interaction between their echo location and solar panels'. However, the radio tracking data and bat survey effort does not appear to have identified any important flight lines. If it is to be assumed that all existing landscape and habitat features including hedgerows, tree lines, watercourses and conservation field margins are used by the important bat assemblage present on the site, then provision of wider buffers along these features should be standard for the scheme. A 5m buffer is a minimum practical width to allow access for machinery to manage hedgerows and margins. Therefore, to be considered sufficient to mitigate potential impacts on bats, and provide benefits in terms of habitat retention and creation, it is recommended that these are enlarged to at least 10m either side of every hedgerow and along all non ancient woodland edges, increased to 20m either side, or swathes and areas omitted from having PV panels altogether, where a significant habitat linkage is identified, or required to provide supporting habitat surrounding important roosts.	Commitment 9.20). This is likely to include corridors linking the Evenlode corridor to other areas of existing habitat. The bat technical note will draw together the habitat data with the survey data to demonstrate how bats will be accommodated within the masterplan The location of the larger buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties. The location and size of the appropriate buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties.

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		Two studies have recorded fewer bats within solar farms in comparison to control plots (Szabadi et al., 2016; Tinsley et al., 2023). Although the specific effect of solar panels on bats is still unknown, Grief & Siemers (2010) found that bats perceive horizontal smooth surfaces (acoustic mirrors) as water due to their similar echo-acoustic properties. Additionally, bats perceive vertical smooth surfaces as open flyways, causing collisions and potential injuries (Grief et al., 2017). Bats can also collide with smooth surfaces of 45 degrees, suffering serious injuries (Ingeme et al., 2018). Bats may find it difficult to orient at solar farms, potentially resulting in avoidance or low usage. Although there are only a few available published scientific studies on the impact of solar farms and PV panels on bats, recent studies suggest that there may be an adverse impact through avoidance and reduced foraging. This recent research is referenced in paragraph 9.9.774 of the Environmental Statement [APP-046], which states "The impact of solar farm sites on bats has been the subject of recent research (Tinsley et al. 2023; Szabadi et al. 2023). This research suggests that there is a potential effect of solar panels on the ability of bats to forage through solar farms, with potential interactions between echolocation and solar panels. Such an effect could lead to bats avoiding fields with panels with associated severance impacts, preventing bats from commuting between roosts and foraging habitat. In order to ensure that such an effect does not occur, the Project will incorporate appropriate buffers along all important commuting habitat used by bats. The incorporation of such buffers will limit any severance impact, ensuring that bat species are still able to forage and commute across the Project site, post development. After the application of this mitigation, the magnitude of impact is therefore, considered to be negligible.' There is, however, insufficient bat survey data to identify all important commuting habitat used by bats. If the ES is referring to all hedgerows, then the 5m buffer is not considered adequate to be sure of preventing avoidance and severance impacts for bats. Should there be even a minor adverse significance of effect, as suggested by the ES, given the vast scale of the development, such altered behaviour could have a detrimental effect on the Annex II bat populations if bats no longer utilise the landscape in the same way for roosting,	

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		commuting or foraging. Providing wider buffers as standard along all hedgerows, as well as omitting key linkages and supporting habitat from installation of PV panels, and/or creating much wider habitat linkages would help to ensure that, should bats have an aversion to the areas of PV panels, there is sufficient space and habitat to allow the ecological functionality of the landscape to remain.	Further survey work and data gathering was completed in 2024 is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This includes: • additional static detector recording (including in-field); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); • full details of trapping/radio tracking to be completed in May 2025 During post submission discussions between the Applicant and Natural England, it was agreed that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.
RR-0761-005 (Natural England)	Lack of Robust Baseline and Construction/Operation Monitoring	As per the Environmental Statement: Chapter 9 [APP-046] and Outline Landscape and Ecology Monitoring Plan (oLEMP) [APP-235], monitoring is not proposed for bats post-development (unless specifically required under licensing for impacts to roosting bats; oLEMP para 16.5.15). Without conducting any monitoring and comparing this with a pre-development baseline it will not be possible to assess whether the development of the site has had an effect on bats, whether that is positive or negative, and highlight the need to address any negative impacts or changes to the management regime. The current level of survey data provides only a minimal baseline for the site, with data for a few localised areas. It would be beneficial to have a more thorough and robust baseline against which to measure change in bat activity or assemblage. A change in how bats utilise the site would not be possible to assess given the current minimal baseline. At the very least, we recommend that there should be a commitment to monitor for changes in bat activity at these limited locations during construction and post-development and incorporate any necessary changes into the LEMP for the site to ensure that the important bat	A post-development monitoring regime has been discussed between the Applicant and Natural England during post-submission discussion. A final version will be set out in the bat technical note.

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		assemblage is not adversely affected by the installation of the PV panels and the operation of the solar farm.	
RR-0761-006 (Natural England)	Lack of Clarity	There are also points of clarity required over the existing value of the site’s habitats for bats. Currently the various submission documents provide differing or contrasting impressions. Paragraph 7.1.4 of the oLEMP [APP-235] states that the River Evenlode corridor ‘comprises almost exclusively further intensively managed arable fields within the active floodplain of the river’. Whereas the Phase 1 habitat survey report indicates that there are many existing grassland habitats along the river, particularly fields 2.31, 2.32, 2.33 and 2.34 in Area 7, 2.35, 2.36, 2.67 and 2.68 in Area 9, field 2.72 in Area 11 and fields 2.93 and 2.94 in Area 13. Furthermore, during a site visit it was observed that some of these fields appeared to be grazing marsh. Although these fields are being retained and management measures brought in via the LEMP to benefit wildlife, there may not be such a significant beneficial change in terms of availability and quality of bat foraging as suggested in the ES and oLEMP. The same is true of the field margins and hedgerow buffers, as although the landscape where the PV panels are proposed is largely under arable cultivation, many of the fields have environmental enhancement measures already present in the form of bee banks and conservation headland habitat provision, much of which is already 5m in width. For example, the existing habitats are described in Chapter 9 of the ES (paragraphs 9.6.11 to 9.6.20) as: Area 1 and 2; “fields are bordered by grassland of varying sward height, up to 6m wide planted as bee boarders”. Area 3 and 4; “fields are arable and contain broad margins and strips of uncultivated vegetation”, “On the western and southern fringes of Area 3 are 5m wide strips of tall uncut grassland. A tall uncut grass fringe up to 5m wide on the north and east side of eastern field of Area 3”. “The fields in both Area 7 and 8 east of the Bladon to Cassington Road are pasture, mostly cut for hay but with some sheep grazing in Area 7”. Also, Paragraph 9.6.47 states “The areas of high invertebrate interest are patchily distributed but the hedgerows and field margins in many places have good connectivity and are well managed for wildlife diversity. The presence of marshy habitats by rivers add to the invertebrate potential of some areas”, which suggests that existing areas of higher potential prey abundance have been	It was agreed during post-submission discussion between the Applicant and Natural England that the Applicant will provide further detail of the Project site’s baseline value for bats within the bat technical note to help Natural England and other IPs to understand the baseline value and hence uplift in that value from the Project.

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		overlooked when considering the value of the site for bats, including the open habitats and influence of existing hydrology."	
RR-0761-007 (Natural England)	Important bat flightline buffers.	It is not clear how many of the proposed hedgerow buffers (proposed as embedded mitigation for impacts to bats), are encompassing existing habitat managed for nature conservation purposes. These margins will already be providing connectivity and foraging resources for bats, and retention although welcomed, is not providing a benefit that would serve to offset any losses of habitat or connectivity.	Details of bat flightline buffers, including interactions with existing margins, where they occur, will be detailed in the bat technical note.
RR-0761-009 (Natural England)	Habitat provision and enhancement.	In terms of habitat provision post-development, there is some discrepancy over what is presented in the oLEMP and what is shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan (LEAP) [APP-228]. On the LEAP it is stated that "Proposed Landscape areas are indicative", and therefore it is not clear how much this plan would change once a DCO had been granted, and whether this is too indicative to be usefully reviewed in the consultation. It currently shows very little woodland planting (a few isolated blocks on plans for Central Site Area 2, 3, and 4 – which is named Zone 2 Evenlode Corridor and Zone 3 Valley Farmland in the oLEMP), and does not reflect all of the measures outlined in the oLEMP, especially concerning woodland creation. For example, the oLEMP refers to "Native species woodland planting to define Project boundaries, provide buffers to existing development and transport corridors, link existing areas of woodland and other habitats and provide visual screening to the Project and help to break up the overall mass of the Project" for the majority of areas of the site including; Zone 1 Northern Estate Farmland, Zone 2 Evenlode Corridor, Zone 3 Valley Farmland and Zone 4 Wooded Estate Farmland, however this is not reflected in the LEALP or Illustrative Masterplan, and therefore it is difficult to visualise how those measures would be achieved on the site. The ES also states that the 'Project has been designed to enhance hedgerow links between blocks of ancient woodland' (table 9.3.1) and it is not clear where these enhanced linkages will be. There is a lack of clarity over what 'reinforced' hedgerows will actually comprise. It is mentioned in paragraph 7.2.5 of the oLEMP that circa 30km of existing hedgerows will be reinforced with additional planting, and 8.2.2 that at least 26km of existing hedgerows are to be reinforced through additional planting, but it is not made clear	The LEAP and Illustrative Masterplan are both intended to be illustrative. However, the final landscape design will follow the principles set out in the oLEMP and, as such, where any apparent discrepancy occurs, the final designs will follow what is set out in the oLEMP. Reinforced hedgerows will include gappy and species-poor hedgerows to be supplemented by species infill planting. A mixture of native species will be used comprise additional planting [APP-235].

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		whether this is along the entire length to create a double hedge, or just in-fill in any gaps, or how exactly this will strengthen existing corridors. Paragraph 11.3.9 states that gappy and species-poor hedgerows will be supplemented by species in-fill planting, so it is not clear whether this comes under the 26km – 30km of the reinforced ones or is an additional measure that is not currently shown on the LEAP.	
RR-0761-010 (Natural England)	Hydrological regime changes.	Table 9.4.2 of Chapter 9 of the ES states that there will be no changes in the hydrological regimes experienced by ecological receptors during construction or operation. However, should creation of floodplain meadow along the length of the River Evenlode be possible, as suggested by the oLEMP, it will be essential to understand whether and how the river has become disconnected from its floodplain and rectify any drying of the land adjacent to allow this habitat to develop as proposed. A change in management is unlikely to have the desired effect if the land no longer floods and the arable habitats or improved grasslands have become disconnected from the river via land drains, level changes or any other previous change to the hydrological functionality of the area. If the land already floods, then this existing habitat, even if seasonal or ephemeral, should be better reflected in the assessment of the existing ecology of the landscape and how this supports wildlife, including the important assemblage of bats present within the site.	The River Evenlode corridor floods extensively on a seasonal basis. However, the majority of fields that would comprise the new habitat creation are farmed as arable land and, as such, do not comprise any form of wet grassland habitat. Notwithstanding this, the value of the Evenlode corridor to bats will be further detailed in the bat technical note.
RR-0761-011 (Natural England)	Bat survey report errors.	There are a few errors in the Bat Survey Report that contribute to a lack of clarity and hinder full interpretation of the report. For example, paragraph 4.1.7 states that "Overall activity at locations S1 and S3 were at similar levels. However, in 2023 S8 was re-deployed at this location and recorded the highest level of bat activity across all the sites in 2023". This paragraph is not only confusing, but contradicts Figures 2.1 and 2.2 which do not show S8 in the same location as S1 or S3. Likewise, data presented within Table 3.26 does not indicate that S8 recorded the highest level of bat activity across all sites in 2023.	The bat technical note will address and amend any errors in previous reporting and interpretation of the data.
RR-0761-012 (Natural England)	Recommendations.	1. Either additional bat surveys conducted (some of which should be paired field interior and field boundary surveys) to identify areas of specific importance for bats or much more extensive buffering of all hedgerows, riparian habitats, woodland, damp/wetland areas and trees, and removal of some proposed areas of PV panel installation where these areas either link known	With the exception of point 6, all other points to be addressed within the bat technical note. With respect to hydrology, the River Evenlode corridor floods extensively on a seasonal basis. However, the majority of fields that would comprise the new habitat creation are farmed as arable land and, as such, do not comprise any form of wet grassland habitat.

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		roosts to wider habitat areas or may be providing supporting foraging habitat. 2. Provide more thorough interpretation of the data obtained from trapping and radio tracking. Interpretation based on detail in the data, such as exactly which bats were trapped in which location, where each individual radio tracked bat was trapped and where it was tracked to, any flight lines or foraging activity recorded during tracking. How roost counts were conducted (dates, duration, weather conditions, equipment used). Whether any ringed bats were encountered or re-encountered. 3. Present interpretation of the bat activity data recorded during the woodland transects and woodland static detector surveys. This would also help build up a picture of bat activity within the zone of influence. 4. Use existing trapping and radio tracking data to investigate how bats currently utilise the site, if these data are available. Or provide rationale for not using radio tracked bats in this way. 5. Provide more detailed plans showing the locations of the static detectors, and clarity over errors in the Bat Survey Report to help better understand this activity data. 6. Provide greater detail of the existing hydrology of the site, including the River Evenlode corridor and how its floodplain currently functions, or reasons why it does not and how this can be rectified. 7. Provide a plan showing the existing areas managed through livestock grazing, hydrology (presence of any damp/wet areas), and conservation field margin measures in arable fields. I.e. existing management measures that may increase prey availability, and where possible relate this to bat survey data and mitigation proposals. 8. Clarify the definitions of 'reinforced hedgerows' and provide more detail on their location as well as the locations of hedgerow enhancement and woodland linkage.	

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		9. Include a commitment to monitoring bat activity during construction and operation and relate this to (ideally a more robust) baseline to identify and address any negative impacts associated with the development and guide LEMP updates or revisions. 10. During pre-application discussions, we advised that a specific document was produced to consolidate information on the impacts to the bat populations, the collected survey data, key flight lines and important habitats, and the specific mitigation measures. We would still recommend that a standalone document would be useful to bring together elements from the ES, Bat Survey Report, Masterplan, LEAP and oLEMP. "	
RR-0761-013 (Natural England)	Dormouse	Given the presence of Dormouse within the network of hedgerows within the site, any hedgerows removals will be subject to licensing requirements. We note that there is no reference to potential impacts to this species whilst hibernating. Dormice hibernate in nests on the ground and are therefore very susceptible to harm during winter habitat management works, particularly machinery tracking over them. There is a high likelihood that they will be present within the rough grassland margins buffering the hedgerows. There is no consideration of reducing this risk outlined in the oLEMP, just that hedgerows will be cut in the winter when dormice are not active: oLEMP paragraph 8.6.1 'Hedgerow and woodland management will take place during winter when dormice are not active (i.e. from November until February). This will also help avoid impacts to nesting birds.' oLEMP Appendix C Typical Maintenance schedule: "Trimming should take place during late winter to maximise food and cover availability for wildlife and also to avoid detrimental effects on breeding birds." oLEMP paragraph 11.3.5 states: 'hedgerows to be cut in late autumn'. Wider buffers between the fencing and the hedgerows would allow for a long-reach tractor-mounted flail to be used to avoid tracking over longer grassland, where it would be much harder to spot and avoid dormouse hibernation nests. If tracking over rough grassland habitat won't be avoidable during autumn/winter hedgerow management then all areas that will have	The oLEMP will be updated in the next iteration to reflect the request with respect to providing additional protection for hibernating dormice.

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		machinery tracking over should be first checked by hand by an experienced dormouse ecologist for the presence of hibernation nests and any nests left in situ and avoided.	
RR-0761-014 (Natural England)	Letter of No Impediment (LoNI) for protected Species Licences	At this stage, Natural England have not been engaged regarding the production of a Letter of No Impediment (LoNI) for protected Species Licences; should this be required, submission of draft protected species licence applications would be required for review. Information relating to wildlife licencing and NSIPs is provided within the Planning Inspectorate's Advice Note 11, Annex C – Natural England and the Planning Inspectorate.	The Applicant and Natural England are in discussion with respect to the provision of LONIs. It is anticipated that those for badger, dormice and GCN will be necessary. The issue of whether a licence is necessary for bats is under discussion.
RR-0761-015 (Natural England)	Biodiversity Net Gain.	We welcome the ambitious plans for nature restoration across the project site, especially along the River Evenlode Corridor and the calculated 80% and 58% net gains in habitat units and hedgerow units respectively. We have provided comments above in section which relate to a lack of clarity regarding the proposed habitat creation. We also note that Paragraph 9.1.6 of the oLEMP states that 'No net gain is targeted for watercourses on the basis that none are being impacted by the Project'. Guidance on assessment of impacts within the Riparian Zone can be found in the Statutory Biodiversity Metric User Guide. A Watercourse Biodiversity Metric calculation should be completed for any changes taking place within 10m of a watercourse, whether that be development or habitat changes. Therefore, it is likely that this assessment is needed, especially if the minor watercourses are not being buffered by more than 5m, and it is stated that the River Evenlode is being reconnected with its floodplain to create floodplain meadow habitat along its length on the site.	The Applicant is currently completing the necessary surveys to allow the river component to be completed. Once completed, this will be provided to the Examination as part of an updated version of ES - Appendix 9.13 Biodiversity Net Gain Assessment [APP-162].
RR-0761-018 (Natural England)	Ancient Woodland and Ancient/Veteran Trees.	Natural England advise that impacts on ancient woodland and ancient and veteran trees should be considered in line with paragraph 180 of the NPPF. Natural England and the Forestry Commission have also produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. We note that there is no Ancient Woodland or ancient/veteran trees within the order limits or within close proximity; as such, have no detailed comments to make.	There are no blocks of ancient woodland within the Project site although some are present adjacent to the order limits and in the surrounding landscape. Ancient and veteran trees do occur within the order limits and ancient woodland immediately adjacent, but there are sufficient RPAs/buffer zones are to be maintained to avoid adverse impacts.
RR-0793-006 (Oxfordshire County Council)	Ecology introduction.	The additional survey work undertaken to inform the ES is welcomed but until the following issues are resolved the application cannot be supported in ecological terms:	Issues raised in this introduction are responded to in turn below.

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		• Further information on the impact and mitigation requirements for bat populations is required. • Further survey of otter and water vole required. • The proposed skylark plots are unlikely to be successful; as previously requested, a farmland bird strategy for the proposed development is required which should consider the need for off-site measures as well as incorporating features for birds within the scheme. • As raised in our EIA scoping response, an assessment of the potential effects on wetland birds and aquatic invertebrates during the operation of the solar farm must be undertaken. • Clarification over the proposed licence arrangement for Great Crested Newts is required. • Detail around resourcing and funding for the monitoring and enforcement of the numerous Landscape and Ecological Management Plans is required.	
RR-0793-023 (Oxfordshire County Council)	Mitigation.	2.1 Overall, it is apparent that previous comments relating to the need for further ecological survey have largely been addressed. In fact, ecological survey over this significant area of Oxfordshire has highlighted the presence of some important species for the County, most notably the presence of maternity roosts for Bechstein's bats (a rare species, not previously recorded breeding in Oxfordshire) and barbastelles, as well as the presence of dormice and nightingale which are very rarely reported in Oxfordshire. These are exciting records for the County, and whilst it is likely that many of the important species found can be accommodated alongside the scheme (perhaps with the exception of farmland birds), we have some concerns that it is not apparent in every case how the ecological surveys have informed design of the scheme to both mitigate impacts and provide species -relevant enhancements.	The approach to mitigation is provided in ES Volume 1, Chapter 9, Section 9.8 [APP-046]. Further species specific enhancements are detailed within the Outline Landscape Management Plan oLEMP [APP-235].
	Aquatic environment.	We also have concerns that the aquatic environment, both in terms of habitat and species it supports, has been somewhat overlooked in the assessment and project design.	Given that all watercourses will be protected with appropriate buffers, as committed within the project's embedded mitigation [APP-046], during both construction, operation and decommissioning of the Project, impacts to the aquatic environment are not anticipated. Further, the delivery of the Evenlode Corridor will ensure a strategic, landscape-level enhancement with respect to the aquatic environment.
RR-0793-024 (Oxfordshire County Council)	Environmental Statement- otter and water vole.	2.2 In our PEIR response we expressed concern about the lack of survey for otter and water vole; the Environmental Statement sets out the approach taken, indicating that there is no need to	Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity [APP-046], otters as an explicit IEF and, as set out in section

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		survey for water vole, as they are considered as a receptor by virtue of assessment of the effects on watercourses. Otters are considered as a receptor within the Environmental Statement (see paragraph 9.6.78 of Chapter 9 [APP-046]), but no survey has been undertaken to determine their presence or use of the watercourses. The Environmental Statement indicates that it is assumed that otter forage and commute within the project site, and that there may be holts along the river, but there has been no survey to confirm this (paragraph 9.9.195 of [APP-046]). It is recognised that short term disturbance to otter could occur due to noise and vibration during construction (paragraph 9.12.180 of [APP-046]); the assessment of the impact of such disturbance would be better informed if it were understood whether there were otter holts along the river as it passes through the project area. This needs to be considered in relation the protection otters receive under the Conservation of Habitats and Species Regulations 2017. Equally, noise and vibration during construction could disturb water vole, again this needs to be considered in relation to the protection water vole receive under the Wildlife and Countryside Act 1981. This is particularly relevant in terms of HDD crossings of watercourses but could also apply to the installation of solar panels in proximity to watercourses.	9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact. This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean et al 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced.
	Environmental Statement- Great Crested Newts (GCN)	2.3 It is noted that only a low population of GCN was recorded in 2 ponds outside the project boundary. Given the presence of low populations nearby, it would be beneficial to improve the habitat for GCN in the scheme area through biodiversity enhancements including provision of more ponds and connected terrestrial habitat. 2.4 The oLEMP [APP-235] refers to use of a Natural England mitigation licence for GCN (paragraph 8.3.1), but elsewhere within the application, use of the District Level Licencing scheme is suggested (commitment number 9.13 of Table 9.8.1 of [APP-046]). Clarification is sought as to which approach will be taken forward. The County and Districts participate in the Nature Space District Licencing scheme which delivers a long-term, landscape scale conservation strategy for great crested newts, funded by development schemes, to mitigate and compensate impacts on great crested newts. To use the District Licence a	The Project will require a licence to address potential effects to GCN populations on and around the site. At this stage, it is anticipated that the Project will use a Natural England mitigation licence for GCN and discussions with NE in respect of this are on-going. However, the Project may make use of the DLL, if that is more appropriate, as per commitment 9.13.

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		requirement would need to be included within the DCO to link the consent to the District Licence; Oxfordshire County Council could authorise use of the licence if needed. We advise liaison with Nature Space with regards use of the District Licence for this scheme.	
RR-0793-025 (Oxfordshire County Council)	Bats	2.5 The Bat Survey Report [APP-153] concluded that the assemblage of bats present is of at least national importance, that two Annex II bat species (barbastelle and Bechstein's) use woodlands adjacent to the site for roosting and that the mosaic of habitats within the Zone of Influence is of at least national importance. 2.6 The Environmental Statement concludes that the impact on the local bat population will be negligible on the basis that all landscape features that are used by foraging, commuting and roosting bats will be retained and protected by buffers (paragraphs 9.9.131 to 9.9.135 of [APP-046]). However, very little information has been presented regarding proposed avoidance or mitigation measures in relation to bats. Mention is made of provision of a suitable buffer to protect all important bat flightlines being incorporated into the 'detailed masterplan' (commitment 9.20 of Table 9.8.1 of [APP-046]). However, important bat flightlines are not identified in the Illustrative Masterplan [APP-062], or other documentation including the oLEMP [APP-235], outline Operational Management Plan (oOMP) [APP-234] or outline Code of Construction Practice [APP-232 and APP-233]. What would be considered a 'suitable' buffer in terms of size has not been defined. 2.7 The Environmental Statement indicates that gaps to be created in hedgerows are mostly <5m and unlikely to cause change in foraging/commuting habitat (paragraph 9.9.132 of [APP-046]). However, again no information is presented in terms of which hedgerows are important bat flightlines to justify this conclusion. 2.8 It is noted that Table 1.1 (documents to support the implementation of the CoCP) of the outline Code of Construction Practice (oCoCP) [APP-232] includes a commitment to produce a construction artificial light emissions plan, however no specific link is made between this and particularly sensitive features for bats, or bat flightlines.	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going
RR-0793-026 (Oxfordshire County Council)	Farmland birds.	2.9 The bird surveys [APP-158] and [APP-159] have identified significant numbers of breeding and wintering farmland birds; the breeding bird survey report indicates the breeding bird assemblage to be of County importance, although this is not	Table 9.6.4 in ES Chapter 9 Ecology and Biodiversity [APP-046] sets out that the breeding bird assemblage is of County importance. This is carried through into the assessment of effects (e.g. section 9.9.90) and in the summary table 9.16.1.

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		correctly reflected in the Environmental Statement which assesses the assemblage as being of local importance only. 2.10 As raised in the PEIR response, there is some question as to how successful skylark plots can be within a solar farm. Skylark plots are not designed to provide nesting sites, but to open up the sward in agricultural settings to increase accessibility to invertebrate prey. Skylarks require long, unbroken sightlines; solar panels reduce the openness of the landscape and therefore reduce the desirability of the area for nesting skylark due to perceived risk of predation. Post construction monitoring of over 100 solar farms in England and Wales found no evidence of nesting skylarks (In Practice, CIEEM Issue 117, Sept 22). 2.11 As previously suggested, we recommend development of a farmland bird strategy for the proposed development, which should consider the need for off-site measures as well as incorporating features for birds within the scheme. There are existing successful local schemes working with landowners on improving habitats for farmland birds, which might be able to support in this. We would welcome discussion with the developer on this and will set out further detail of how this would work in the LIR. 2.12 It is appreciated that areas left undeveloped due to archaeological interest will be used to provide wildflower areas for the benefit of a range of species, however these areas are not large enough to provide sufficient scope for nesting skylarks to offset the areas lost.	Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species. The Project site will be managed through conservation grazing to create grasslands of varied diversity and structure. Recent research on the impact of solar farms on farmland birds (Copping et al 2025) found that solar managed for mixed habitats (either ungrazed or grazing with an allowance for wildflowers to set seed, woody hedgerow features) had significantly higher numbers of both farmland birds and bird species than an intensive arable baseline. Given that, as set out in the oLEMP [APP-235], the Project will be managed via conservation grazing with pauses in the grazing over the summer to allow plants to flower and set seed, it is anticipated that the Project will provide an overall enhancement for the bird assemblage present.
	Operational impacts on wetland birds and aquatic invertebrates.	2.13 No assessment has been provided of the potential effects during operation of the solar farm on wetland birds and aquatic invertebrates, despite this having been raised in our EIA scoping consultation response. The Zone of Influence for the assessment should take this into account, particularly given the proximity of large waterbodies of value to birds in the wider area, including Farmoor Reservoir, Cassington Gravel Pits, Blenheim lakes, and in the wider area, Otmoor and the Lower Windrush Valley complex. An understanding of the use of the wider landscape by wetland birds and aquatic invertebrates is needed to assess how the solar panels might influence behaviour of these species (evidence suggests that the polarised light of solar panels can be confused by these species for open water) and consequent impacts on their	Operational impacts on all breeding and wintering birds, and invertebrates identified within the Botley West Solar Farm have been assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [APP-046]. Although the lake effect has been hypothesised as a possibility, a review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. Research in the United States found some evidence that such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations and no evidence has been published demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping et al. 2025).

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		populations through mortality or reduced breeding success.	
RR-0793-027 (Oxfordshire County Council)	Biodiversity Net Gain.	2.14 We welcome the commitment to deliver biodiversity net gain above the minimum mandatory requirement of 10% due to come into force in November 2025. We note that the statutory metric has been used to calculate biodiversity net gain in line with the recommendations in Section 4.6 of EN-1, reporting a predicted 80.80% net gain in habitat units and 57.93% net gain in hedgerow units. It is notable that no calculation has been made of baseline or post development watercourse units. According to the Statutory Metric User Guide, if the site boundary crosses into the riparian zone (as is the case for this scheme), all adjacent lengths of watercourses should be included in the watercourse module. It is noted that no delay in starting habitat creation has been included within the temporal multiplier for the metric, although it is understood that the construction period is two years. Clarification is sought as to whether there will be any delays in habitat creation.	Following discussions with Natural England, the watercourse section of the metric will be included in the BNG Assessment, following River Morph surveys. Although the total construction period is anticipated to be two years, as a staged approach to work areas will be undertaken (excluding temporary compounds), it is considered that the majority of the site will be constructed in less than one year from construction, as such the Project does not require temporal multipliers to be entered. This will be developed once further details of construction methodologies and timings become available.
RR-0793-028 (Oxfordshire County Council)	Local Nature Recovery Strategy	2.15 The Biodiversity Net Gain Assessment [APP-162] references (on pages 3 and 6) the Oxfordshire draft Nature Recovery Network in designing biodiversity net gain and calculating strategic significance. It should be noted that OCC, as Responsible Authority, is leading a partnership process to develop the Local Nature Recovery Strategy (LNRS) for Oxfordshire as mandated by the Environment Act 2021. The LNRS will be critical in delivering government targets for species abundance and habitat creation commitments, as well as wider environmental outcomes. The draft Oxfordshire LNRS was subject to public consultation in October 2024 and the draft documents are available on our consultation pages. We are aiming to publish the final Oxfordshire LNRS in Autumn 2025. 2.16 The aim of the Applicant's scheme, to establish a landscape-scale wetland corridor along the River Evenlode (see page 6 of [APP-162]), is welcomed, and aligns with the priorities and mapping in Oxfordshire's emerging LNRS. 2.17 It is noted that hedgerow planting is planned to provide connectivity between Tackley Wood and the Blenheim Estate, Bladon and Burleigh Woods. While this is welcomed, we would suggest that the potential to use hedgerow and woodland buffers for wood-pasture creation or natural woodland regeneration in this area is explored to provide greater woodland connectivity, aligning with	Noted re the broad alignment between the Ecology Strategy for the Project and the emerging LNRS. The Project has committed to providing appropriate buffers along key flightlines for bats (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). The nature of the buffers with respect to management and habitat creation will be set out in more detail in the bat technical note to be published. However, it is intended that such buffers support the connectivity for bats and other wildlife between the ancient woodland blocks and ensure that the overall permeability of the landscape remains post development.

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		mapped measures in the emerging LNRS, and supporting the important bat populations identified through the surveys. 2.18 The species surveys flagged the presence of some very rare/under-recorded species for the County, notably the Bechstein and barbastelle bats at Bladon Heath, but the presence of nightingale and dormice is also significant with both species recorded in very low numbers in Oxfordshire. Identification of habitat creation measures specifically aimed at supporting these species would be welcomed.	
RR-0793-029 (Oxfordshire County Council)	Wider Environmental Benefits	2.19 Paragraph 4.6.15 of EN-1 states that "applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wide environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design..." It is not immediately apparent that such a statement has been submitted with the application. Some information on wider environmental benefits is included with the draft Oxfordshire LNRS documents, and we are seeking to reflect this further in the Local Habitat Map prior to publication. Work undertaken by Oxford University has mapped natural capital baselines and natural capital opportunities across Oxfordshire and would provide a good starting point for considering priorities for delivery of wider environmental benefits through the scheme.	The benefits of the Project with respect to ecology are set out in Section 7 Ecology Strategy of the oLEMP [APP-235]. This defines the ecological vision for the Project and is based on incorporating the aims of the Oxfordshire Nature Recovery Network, the forerunner of the emerging Oxfordshire LNRS.
RR-0793-031 (Oxfordshire County Council)	OLEMP lifespan.	2.21 Paragraph 5.4.44 of EN-1 5.4.44 states that "any habitat creation or enhancement delivered ... for compensation or biodiversity net gain should generally be maintained for a minimum of 30 years or for the lifetime of the project, if longer". The oLEMP [APP-235] mentions monitoring for 30 years (paragraph 15.1.5), but elsewhere references monitoring for the lifetime of the project (paragraphs 1.1.10 and 17.1.1). Clarification and correction of the documents is therefore suggested to confirm that management, and monitoring should be undertaken for the lifetime of the project as a minimum. We would encourage the ongoing management of habitats created for compensation and biodiversity net gain beyond the life of the project.	The Project site will be managed and maintained for the lifetime of the Project, as set out in paragraphs 1.1.10 and 17.1.1 of the oLEMP. The reference to 30 years is in respect of the minimum commitment for the maintenance of features for Biodiversity Net Gain purposes. However, this will be clarified in the next iteration of the oLEMP.
	OLEMP council funding.	2.22 It is set out that the intention is for multiple LEMPs (covering different zones of the scheme) to be approved by Districts prior to commencement. While this is a matter for the Districts, OCC considers it is essential the Districts are adequately	The discharge of Requirements is a statutory function of the host authorities and, as such, it is not the role of the Applicant to fund this. However, the Applicant has had a Planning Performance Agreement (PPA) with the host authorities to cover their input of the Project to submission and are in the process of agreeing one to cover input to the Examination.

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		resourced and funded to do this. The same point applies to any requirement which must be discharged by a local authority.	They may, therefore, look to extend this to cover post consent Requirement discharge etc.
	Invertebrate enhancements.	2.23 The oLEMP [APP-235] refers to provision of bee hives (paragraph 10.2 (River Evenlode Corridor), fourth bullet; paragraph 10.2 (Wildflower Meadow Grasslands), third bullet; paragraph 10.2 (Woodlands), final bullet; and paragraph 11.8.1); we would question whether this is an appropriate measure for biodiversity benefit. Honeybees are not native to the UK, and would potentially compete with native pollinators (such as bumble bees, solitary bees, butterflies and hoverflies) for nectar sources. However, the diagram of the 'bee hive' provided in Appendix A (figure 4) to the oLEMP would be better described as a 'insect hotel' than a bee hive. Clarification is therefore sought as to what the proposed provision is for pollinators. A more appropriate measure to support declining native pollinator species would be to include specific planting for pollinators in edge habitats, similar to measures to provide nectar species under Countryside Stewardship.	The bee hives will be in accordance with those identified in Appendix A of the OLMEP [APP-235], providing habitat for native invertebrate species. Project edges containing meadow grassland with wildflowers for invertebrates are outlined in the OLEMP [APP-235].
RR-1086-19 (Vale of Whitehorse District Council)	Impacts to Ancient Woodland.	Adverse impacts on Ancient Woodland are unacceptable unless there are wholly exceptional reasons, and a suitable compensation strategy exists. PH are identified under s41 of the NERC Act 2006 as being of principle importance for the purpose of conserving and enhancing biodiversity. Adverse impacts should be avoided wherever possible, and opportunities to enhance them taken.	The Project has been designed to avoid areas of ancient woodland such that none occur within the order limits. Measures would be put in place to ensure that a minimum 15 metre buffer is retained between ancient woodland and construction areas. Appropriate fencing in accordance with BS 5837, would be erected around the 15 metre buffer to prevent access by people, materials or machinery to avoid compaction of soils or roots and to avoid any accidental damage, as per Natural England guidance.
RR-1086-20 (Vale of Whitehorse District Council)	License applications.	The development will have impacts on protected and priority species. Where development activities require a derogation licence from Natural England to proceed lawfully, the Secretary of State should be satisfied that such a licence is likely to be granted when considering any relevant tests of derogation.	Draft license applications will be submitted to Natural England for relevant species, in order to receive Letters of No Impediment (LONI).
	Skylark mitigation.	Measures intended to avoid, mitigate, and compensate for impacted species should be likely to succeed and be robustly secured. VWHDC remains concerned that the proposed approach to skylark compensation, through the provision of interspersed skylark plots, is unlikely to be successful. Skylarks are an open-ground nesting species with strong anti-predator behavioural tendencies which mean that they are unlikely to utilise plots in proximity to structures, trees or boundaries. The placement of skylark plots within array complexes (close to individual panels) means	The plots are not intended to be used as mitigation for breeding skylark territories per se. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity of species that might nest either within the archaeological areas which are spread throughout the Project site and which will be managed specifically for birds (both wintering and breeding) or in fields near to the Project site. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species.

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		that those plots are unlikely to be used for breeding.	
RR-1086-21 (Vale of Whitehorse District Council)	Biodiversity Net Gain.	NSIPs are not currently subject to mandatory BNG. However, a net positive biodiversity outcome should be targeted. Solar schemes generally tend to offer the ability to provide BNG onsite, where the original habitat is of low value. In this case, the transition from arable land to grassland underneath solar panel arrays is likely to lead to a gain. However, due to the impacts of arrays on availability of light, rainfall, humidity and management, it is recommended that a precautionary approach is taken when considering the value of grasslands that can be created and maintained as part of the proposals. The Secretary of State should be content that a thorough and evidenced BNG assessment has been completed and that the establishment and ongoing maintenance of habitats is secured robustly. Should VWHDC be required to take on monitoring or enforcement functions, suitable financial contributions should be secured to ensure that this is possible.	The calculation of the project's Biodiversity Net Gain (BNG) is set out in the Biodiversity Net Gain Assessment, provided in Volume 3, Appendix 9.13 [APP-162]. BNG for Nationally Significant Infrastructure Projects is expected to become a requirement from late November 2025, expected to be set at 10% BNG. The outline maintenance and monitoring of BNG landscape elements of the site is set out in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235]. The OLEMP is part of the project's embedded mitigation and will be secured in the Development Control Order (DCO) [AS-009].
RR-1102-14 (West Oxfordshire District Council)	Biodiversity Net Gain.	The Council welcomes the commitment to deliver Biodiversity Net Gain (BNG) above the minimum statutory requirement of 10% due to come into force in November 2025. The statutory biodiversity metric has been used to calculate the BNG outcome from the proposed development. However, this has only been calculated for area habitats and hedgerows, without taking account of the presence of watercourses within the site. As the red line boundary of the site encompasses a watercourse, to ensure compliance with the statutory biodiversity metric user guide, the watercourse module should be applied. Clarity is also needed as to whether a delay to habitat creation and enhancement works should be applied in the metric due to the construction period of two years.	Following discussions with Natural England, the watercourse section of the metric will be included in the BNG Assessment, following River Morph surveys. Although the total construction period is anticipated to be two years, as a staged approach to work areas will be undertaken (excluding temporary compounds), it is considered that the majority of the site will be constructed in less than one year from construction, as such the Project does not require temporal multipliers to be entered. This will be developed once further details of construction methodologies and timings become available.
RR-1102-15 (West Oxfordshire District Council)	Farmland birds.	Although the majority of farmland birds and other birds recorded breeding/foraging and over wintering on site will be effectively mitigated for as part of the enhancement proposals for the solar farm, including hedgerows, woodlands, scrub and tussocky grassland, the Council are concerned about the proposed mitigation for skylark and lapwing. There are both priority species and written into the NPPF Chapter 15. The breeding bird assemblage identified within the project area is of county importance (Table 9.6.4	Table 9.6.4 in ES Chapter 9 Ecology and Biodiversity [APP-046] sets out that the breeding bird assemblage is of County importance. This is carried through into the assessment of effects (e.g. section 9.9.90) and in the summary table 9.16.1. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species.

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		page 60 of the ES) and the Council therefore recommend that this should be given detailed consideration at examination to ensure that impacts on protected and priority species are avoided and adequately compensated. The proposed development will result in significant loss of breeding territories for the local skylark population resulting in a landscape scale impact. The proposed skylark plots within the project area are to provide winter foraging habitat for skylarks rather than being used for breeding. Mitigation for loss of breeding habitat is proposed via the creation/enhancement of 36 hectares (ha) of meadow on land that is not being used for solar arrays due to their archaeological importance. However, this quantum of compensatory habitat is unlikely to be sufficient as it appears to be comprised of small, spread-out parcels of land across the project area. Skylarks are unlikely to use proposed skylark plots for breeding when surrounded by solar panels as they require long, unbroken sightlines and minimal perches for raptors (predators). The solar panels themselves will therefore reduce the desirability of the area for nesting skylark due to the perceived risk of predation. Post-construction monitoring of over 100 solar farms in England and Wales found no evidence of nesting skylarks (In Practice Issue 117, September 2022, Chartered Institute of Ecology and Environmental Management, CIEEM). The Council calculates that in order to compensate for the recorded 228 no. breeding territories identified through the applicant's assessment, the development will need to provide 114ha of suitable habitat (based on two skylark territories per ha). In the absence of further clarification and justification for the applicant's approach, proposed compensatory habitat would appear to be insufficient. Measures to safeguard protected and priority species within the project area are essential but it is not clear whether specific measures or mitigations are included in the scheme to compensate for impacts on lapwing and nightingale habitat.	The Project site will be managed through conservation grazing to create grasslands of varied diversity and structure. Recent research on the impact of solar farms on farmland birds (Copping et al 2025) found that solar managed for mixed habitats (either ungrazed or grazing with an allowance for wildflowers to set seed, woody hedgerow features) had significantly higher numbers of both farmland birds and bird species than an intensive arable baseline. Given that, as set out in the oLEMP [APP-235], the Project will be managed via conservation grazing with pauses in the grazing over the summer to allow plants to flower and set seed, it is anticipated that the Project will provide an overall enhancement for the bird assemblage present.
RR-1102-16 (West Oxfordshire District Council)	Farmland bird strategy.	It is likely that a farmland bird compensation strategy will be required for the proposed development, which would need to consider the provision of off-site measures. This should be explored at Examination to ensure that the statutory and policy protections are being met.	The provision of extensive new permanent areas of bird habitat in the form of the archaeological areas to be managed for bird benefit, combined with the overall beneficial effect of solar compared to an arable baseline (as described by Copping et al 2025) means that the Applicant considers there to be no requirement for off-site mitigation with respect to farmland birds.

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RR-1102-17 (West Oxfordshire District Council)	Wetland birds and aquatic invertebrates.	There has been no assessment of the potential effects during operation of the solar farm on wetland birds and aquatic invertebrates. The zone of influence of the impact assessment should take this into account due to the close proximity of several large waterbodies of value to birds in the local area, including Cassington Gravel Pits, Blenheim Lake and the Lower Windrush Valley Project Area. An understanding of the use of the wider landscape by wetland birds and aquatic invertebrates is needed to assess how the solar panels might influence the behaviour of these species and consequent impacts on their populations through mortality or reduced breeding success. Evidence suggests that the polarised light of solar panels can be confused by these species for open water, for example, resulting in dragonflies laying eggs on them. The size and density of the proposed solar farm project is such that this could result in a significant effect on local populations. The impact of the new linear corridors for wildlife created by the proposed screening is to be welcomed but the adverse impact upon species wishing to roam locally but prevented from so doing by the new fences and screening also needs to be factored in.	Operational impacts on all breeding and wintering birds, and invertebrates identified within the Botley West Solar Farm have been assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [APP-046]. Although the lake effect has been hypothesised as a possibility, a review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. Research in the United States found some evidence that such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations and no evidence has been published demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping et al. 2025).
RR-1102-18 (West Oxfordshire District Council)	Bats.	The bat survey concluded that the assemblage of bats present at the site is at least of national importance, due to the presence of two Annex II species – Bechstein's and Barbastelle bats, which are using woodlands adjacent to the site for roosting, including maternity colonies. The mosaic of habitats within the site are also considered to have at least national importance for bats, including for foraging and commuting. However, the Environmental Statement concludes that the impact on the local bat population will be negligible due to the retention of the majority of the landscape features that the bats are using for foraging, commuting and roosting, and the protection of these with buffers. However, In particular, although there is mention of the provision of a suitable buffer to protect all important bat flightlines as a key commitment (ref. 9.20), these are not shown on the Masterplan or in any other documentation, including the CoCP, Outline Operation Management Plan and Outline Landscape and Ecology Management Plan submitted with the application. there is limited information regarding proposed avoidance or mitigation measures for bats. In particular, although there is mention of the provision of a suitable buffer to protect all important bat flightlines as a key commitment (ref. 9.20), these	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England/other IPs with respect to the use of these data for this commitment are on-going.

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		are not shown on the Masterplan or in any other documentation, including the CoCP, Outline Operation Management Plan and Outline Landscape and Ecology Management Plan submitted with the application. The conclusion in the Environmental Statement that 5 metre gaps to be created in hedgerows are unlikely to cause changes to commuting routes and foraging habitats is unjustified as no information has been provided with regard to which hedgerows are important bat flightlines. This conclusion is therefore unsupported.	
RR-1102-19 (West Oxfordshire District Council)	Otter and wate vole.	The Environmental Statement indicates that it is assumed that otters and water voles forage and commute within the project site, and that there may be otter holts (or laying up sites) along the river, but no surveys have been carried out to confirm this. It is recognised that there could be short term disturbance to otters due to noise and vibration during construction, and the impact assessment would be better informed if it were understood whether there were any holts present along the river within the site. This is equally applicable to the potential for water voles to be present on the river (the Environmental Statement takes the approach that this species is adequately covered in the assessment of impacts to watercourses). This is particularly relevant to any crossings over watercourses within the site but could also apply to the installation of solar panels near watercourses (not just the main river).	Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity [APP-046], otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact. This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean et al 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank

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			will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced. All watercourses will be crossed via HDD with no open-cut methods proposed.
RR-1102-20 (West Oxfordshire District Council)	Great crested newts.	The ES ecology chapter appears to keep the licensing option for great crested newts open and refers to both a great crested newt mitigation licence and the District Licensing Scheme (administered by NatureSpace). However, Section 8.3.1 in the Outline LEMP states that a Natural England mitigation licence will be obtained for the site, so no off-site compensation would be possible. It is unclear why the District Licensing option has been discounted. If the District Licensing Scheme is not used, then we would consider this a significant missed opportunity for landscape-scale conservation for this species if all habitat works are carried out on site only (via the standard mitigation licence approach). Use of the District Licensing Scheme can be secured via the appropriate wording from the standard planning conditions and translated into planning requirements within the DCO. The Council recommends that NatureSpace should be consulted for their comments to inform the Examination to understand the details of the likely impacts to this species. The closest ponds are located 20m (P83) and 30m (P64) of the site boundary and the nearest great crested newt population through surveys was P19, 130m from the site. Although the majority of suitable habitat will be retained, apart from small sections of hedgerow spread across the site for vehicular access, there would be temporary disturbance and loss of terrestrial habitat as a result of the proposed development. The council notes the negative eDNA result from the ponds at City Farm where great crested newts were previously recorded (for the Salt Cross Garden Village outline planning application) and that ponds with a 'below average' or lower score in the HSI assessment were not subject to an eDNA survey. Negative eDNA survey results from a single survey are not sufficient to prove absence, several years' worth of negative eDNA results are needed in line with Natural England guidelines (for licence applications) and the species does occur in below average suitability ponds. The HSI assessment is not intended to be a marker for which ponds are likely to contain newts or not.	The Project will require a licence to address potential effects to GCN populations on and around the site. At this stage, it is anticipated that the Project will use a Natural England mitigation licence for GCN and discussions with NE in respect of this are on-going. However, the Project may make use of the DLL, if that is more appropriate, as per commitment 9.13.
RR-1102-21 (West Oxfordshire District Council)	Outline Landscape and Ecology Management Plan (OLEMP)	The Outline LEMP refers to a detailed LEMP being produced by condition as part of the DCO. The Council recommends that this should be for	The Project site will be managed and maintained for the lifetime of the Project, as set out in paragraphs 1.1.10 and 17.1.1 of the oLEMP. The reference to 30 years is in respect of the minimum commitment for the

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		lifetime of the development and include monitoring for BNG. The guidance in EN-1 5.4.44 indicates that any habitat creation or enhancement delivered for compensation or Biodiversity Net Gain would be maintained for a minimum of 30 years, or for the lifetime of the project, whichever is longer. The oLEMP mentions monitoring for 30 years, but elsewhere references monitoring for the lifetime of the project. Clarification and correction of the documents is therefore suggested to provide certainty that management and monitoring will be undertaken for the lifetime of the development as a minimum. The Council would also encourage the ongoing management of habitats created/enhanced as compensation and for Biodiversity Net Gain to extend beyond the lifetime of the project. The Outline LEMP lists the inclusion of "bee hives" in (see section 9.12 of Table 9.8.1 on page 71 of the ES ecology chapter), however, we are unconvinced that it would be appropriate as it would increase competition with native bumblebees and other pollinating insects. Depending on the number of bee hives, it might be possible to locate these in areas of wildflower-rich habitat to ensure a lower level of competition with native bees. Further clarity is required on this part of the proposals. It is the intention as set out in the oLEMP for multiple LEMPs to be produced for the different zones within the site, and for these to be approved by the District Councils before they can be responsible for monitoring the implementation of the LEMPs. The applicant needs to demonstrate the mechanism for ensuring that the District Councils are adequately resourced and funded to do this and set out the mechanisms whereby the District Councils could take enforcement action in case of non-compliance commencement. This presents an issue in terms of oversight of the whole project and who will be responsible for monitoring the implementation of the LEMPs. The applicant needs to demonstrate the mechanism for ensuring that the District Councils are adequately resourced and funded to do this and set out the mechanisms whereby the District Councils could take enforcement action in case of non-compliance.	maintenance of features for Biodiversity Net Gain purposes. However, this will be clarified in the next iteration of the oLEMP. The bee hives will be in accordance with those identified in Appendix A of the OLMEP [APP-235], providing habitat for native invertebrate species. Project edges containing meadow grassland with wildflowers for invertebrates are outlined in the OLEMP [APP-235].
RR-1102-22 (West Oxfordshire District Council)	Landscape proposals.	The aim of the proposed development is to create a landscape-scale wetland corridor along the River Evenlode, which is welcomed by the Council, and this aligns with the priorities and mapping in the emerging Local Nature Recovery Strategy for Oxfordshire. However, there the enhanced connectivity for other habitats, notably ancient woodlands, is not given the same weight.	Noted re the broad alignment between the Ecology Strategy for the Project and the emerging LNRS. The Project has committed to providing appropriate buffers along key flightlines for bats (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). The nature of the buffers with respect to management and habitat creation will be set out in more detail in the bat technical note to be published. However, it is intended that such buffers support the connectivity for bats and other

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		Hedgerow planting is planned to provide connectivity between Tackley Wood and the Blenheim Estate, and Bladon Heath and Burley Woods. While this is welcomed in principle, the current proposals only integrate the minimum 15 metre buffer to these ancient woodlands, and this would seem to be a missed opportunity to allow for woodland expansion in future. The woodlands would effectively become surrounded by solar panels for 42 years and therefore restrict the ability of any future woodland restoration plans. The Council recommends that the potential for wood pasture and natural woodland regeneration in the area is explored further to provide greater woodland connectivity, aligning with the mapped measures in the emerging LNRS and supporting the important bat populations that have been found to use these woodlands.	wildlife between the ancient woodland blocks and ensure that the overall permeability of the landscape remains post development.
RR-1045-004 (Thames Water)	Farmoor Reservoir Sensitivity	The Proposed Scheme’s construction activities near Farmoor Reservoir, a sensitive recreational and ecological site, must include bespoke method statements to mitigate noise, vibration, and other disturbances. TWUL is concerned about potential adverse impacts on the reservoir’s operations and its environmental and community value. The reservoir embankments and associated infrastructure must be protected from excessive vibration, ground movement, and other disturbances that could compromise their stability. Additionally, the reservoir is an important habitat for wildlife and a valued recreational space for the local community. Noise, dust, and construction-related disturbances could have detrimental effects on biodiversity, including bird populations, and impact public enjoyment of the area. The Application only considers residential receptors and therefore does not assess this. TWUL is keen to engage with the Applicant but further work is required, and further design detail of the Proposed Scheme will need to be provided. A Side Agreement is likely to be required to regulate the interface of the proposed development with the reservoir.	Ecology: The Farmoor Reservoir is a Local Wildlife Site and as such is a locally designated site. Impacts from the Botley West Solar Farm on locally designated sites are assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. Project impacts will be mitigated by a comprehensive package of embedded mitigation, as outlined in ES Volume 1, Chapter 9, Section 9.8 [APP-046]. Embedded mitigation measures will be implemented under various management plans, outline versions of these plans include the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235], Outline Code of Construction Practice (OCoCP) [APP-232 & 233] and Outline Decommissioning Plan (ODP) [APP-236]. Embedded mitigation will be secured in the Development Control Order (DCO) [AS-009]. Construction management: A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. This assessment has identified that the development will not cause any significant adverse effects on noise sensitive receptors. This assessment includes consideration of noise from construction vehicles. During the construction and decommissioning phases, noise and vibration will be controlled and limited by the Outline Code of Construction Practice [APP-232 & 233] (oCoCP). This code of practice will ensure that no resident experiences a significant adverse effect. The oCoCP includes construction phase noise limits, and construction times. Paragraph 1.2.2, states the purpose of the oCoCP is to set out a written set of standards and measures that will be implemented during the construction process to ensure a consistent and effective approach to managing potential environmental impacts in order to minimise nuisances to communities and to safeguard the environment. The measures include strategies, control measures and monitoring procedures for managing the potential

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			environmental impacts and limiting disturbance from construction activities as far as reasonably practicable. The oCoCP [APP-232 & 233] Annex A Outline Construction Traffic Management Plan, at paragraph 1.1.7, states that the purpose of the OCTMP is to set out how the numbers and routing of Heavy Goods Vehicles (HGVs) will be managed during the construction phase, how the movement of construction worker traffic will be managed during the construction phase, details of measures to manage the safe passage of HGV traffic via the local highway network and details of localised road improvements if and where these may be necessary to facilitate safe use of the existing local highway network. Paragraph 1.1.8 states A detailed Construction Traffic Management Plan(s) (CTMP)(s), will be prepared strictly in accordance with this OCTMP and in consultation with Oxfordshire County Council (OCC) as the Local Highway Authority and National Highways as the highway authority for the strategic road network. Although one detailed CTMP is envisaged, should NGET wish to adopt their own separate detailed CTMP specific to the construction of their substation that forms part of the Project (as set out in Volume 1, Chapter 6: Project Description of the ES), it would be prepared separately but remain strictly in accordance with this OCTMP. The applicant will continue to engage with TWUL and will provide further design and scheme information as requested. A side agreement will be developed with TWUL in relation with the reservoir. The LVIA [APP-045] has identified significant effects upon visual amenity, including from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would not have significant effects beyond those identified, within the LVIA [APP-045], at a very local level or where it would be difficult to entirely mitigate visual effects (not a requirement of this CNP infrastructure project). In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape.
24. Needs Case			
67, 91, 116, 145, 208, 271, 300, 310, 333, 343, 353, 360, 378, 404, 405, 407, 453, 456, 487, 488, 502, 505, 506, 520, 534, 572, 583, 625, 656, 674, 691, 720, 736, 780, 818, 819, 851, 853, 860, 862, 882, 900, 900, 920, 933, 999, 1008, 1014, 1061, 1067, 1099, 1099	Lack of justified Need	There is insufficient need case to allow the development	See the Planning Supporting Statement (PSS) [APP-225], para 2.1.4 sets out the basis for need for solar farms and other forms of low carbon energy infrastructure. The need for renewable energy infrastructure is established by NPS EN-1 which confirms that it is 'critical national priority infrastructure'. Paragraphs 3.2.6 to 3.2.8 confirm that the Secretary of State "should assess all applications ... on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent", that "substantial weight should be given to this need" and that it is not necessary to "consider separately the specific contribution of any individual project to satisfying the need established in this NPS". See also Applicants Supplementary Statement of Need [PDB-014].
89, 100, 101, 184, 200, 219, 327, 342, 394, 401, 433, 486, 510, 593, 753, 810, 818, 855, 1010, 1105	Already sufficient supply to meet need	Many RR dispute the quantum of renewable energy projects 'in the system', and consented or required compared to Government targets	NPS EN-1 confirms in para 4.2.21 that starting from the position that energy security and decarbonising the power sector to combat climate change this requires a significant number of deliverable locations for CNP Infrastructure and for each location to maximise its capacity. The NPS imposes no limit on the number of CNP infrastructure projects that may be consented. Paragraph 3.2.4 of NPS EN-1 further confirms that "it is not the government's intention in presenting any of the figures or targets in this

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			NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs". See also the Applicants Supplementary Statement of Need [PDB-014] .
218, 248, 358, 411, 550, 890	Solar is inefficient	Claims that solar is inefficient compared to other technologies and so should not be consented	Relative efficiency of one form of renewable energy versus another is not a determinative factor in the provision of renewable energy policy. Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The urgent need for CNP infrastructure to achieving our energy objectives, together with national security, economic, commercial and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible. This is set out in section 3 of NPS EN-1. Paragraph 3.3.21 specifically recognises that wind and solar are likely to be the predominant forms of electricity generation needed to provide a secure, reliable and affordable net zero consistent system in 2050. See also the Applicant's Supplementary Statement of Need [PDB-014] which addresses the role solar farms can help in dealing with demand; additional reasons for the siting and scale of the solar farm, and information on efficiency.
150, 155, 426, 433, 462, 479, 481, 495, 511, 514, 515, 539, 545, 549, 573, 705, 878	Profit driven intentions		NPS EN-1 recognises the important role of new low carbon energy generation to the economy, stating at paragraph 2.1.3 that high quality infrastructure "is crucial for economic growth", whilst Part 3 of NPS EN-1 sets out the importance of energy to economic prosperity and social well-being. NPS EN-3 further recognises that renewable energy resources can only be developed "where economically feasible", recognising the role of developers to delivering the government's targets for low carbon energy generation.
25. Noise and Vibration			
4, 58, 89, 145, 207, 217, 250, 279, 310, 324, 331, 354, 386, 448, 451, 466, 468, 482, 49, 1520, 560, 564, 574, 592, 610, 651, 655, 672, 712, 727, 729, 744, 755, 759, 775, 782, 786, 801, 814, 845, 908, 913, 916, 917, 931, 941, 962, 988, 1023, 1052	Construction Phase Noise	General concerns over the potential adverse impact of construction phase noise and vibration from either construction phase traffic, or from the construction works themselves.	A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference [APP-050] , with additional information provided in ES Volume 2 (Figures) [APP-104 & 105] , and ES Volume 3 (Appendices) [APP-211 to 213] . This assessment has identified that the development will not cause any significant adverse effects on noise and vibration sensitive receptors. This assessment includes consideration of noise from construction vehicles. During the construction and decommissioning phases, noise and vibration will be controlled and limited by the Outline Code of Construction Practice [EN010147/APP/7.6.1] (CoCP). This will ensure that no resident experiences a significant adverse effect. The CoCP includes construction phase noise limits, and construction times.
30, 128, 194, 252, 342, 665, 766, 833, 855, 931, 942, 1080, RR-1076-011	Health and Wellbeing Effects	The comments relate to the potential adverse effect that noise and vibration form the development will have on residents' wellbeing.	A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference [APP-050] , with additional information provided in ES Volume 2 (Figures) [APP-104 & 105] , and ES Volume 3 (Appendices) [APP-211 to 213] .

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			This assessment has identified that the development will not cause any significant adverse effects on noise and vibration sensitive receptors. The technical guidance that the assessment utilises has been developed using health-based metrics to determine a level of annoyance from the human receptor. The development aligns with health based noise impact levels. Therefore, adherence with this guidance reduces the likelihood of annoyance through mitigation, and subsequently any health-based reactions are unlikely.
99, 137, 267, 333, 384, 393, 429, 466, 516, 552, 564, 566, 648, 651, 732, 758, 763, 837, 846, 908, 912, 924, 934, 950, 963, 978, 995, 998, 1004, 1077	Lack of Mitigation or Assessment	There is concern from consultees that appropriate noise mitigation has not been incorporated into the design.	A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. This assessment has identified that the development will not cause any significant adverse effects on noise and vibration sensitive receptors. During the construction phase, noise will be controlled and limited by the Outline Code of Construction Practice [APP-232] (CoCP). This will ensure that no resident experiences a significant adverse effect. The CoCP includes construction phase noise limits, and construction times, and the implementation of Best Available Technique (BAT) throughout the entire construction phase. Noise from the operational phase will be controlled and limited by the Outline Operational Management Plan [APP-234] (OMP). This includes noise mitigation measures which will ensure that no resident experiences a significant adverse effect. Mitigation measures include noise limits for operational noise sources, as well as the location of operational phase noise sources to reduce the potential noise impact on receptors.
237 , 240	Long-Term or Continuous Noise	Concern over the on-going sound either during the construction, and/or operation of the development.	The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. The assessment shows that receptors will not experience a significant adverse effect from noise or vibration and includes a consideration of the period of time taken for the construction of the development (e.g. 24 months), and the operational cycle. Furthermore, the assessment considers the maximum design scenario with construction activities taking place on all sites at the same time, which is unlikely to be the case in practice.
201, 295, 298, 317, 428, 495, 571, 753, 865, 876	Noise Pollution in Quiet/Rural Areas	Consultees are concerned that the development will cause an adverse noise impact in the current environment, which is viewed as being quiet and rural.	The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. The assessment shows that receptors will not experience a significant adverse effect from noise or vibration. The assessment relies upon the baseline noise monitoring which has been undertaken across the Site. The results of this baseline survey have been

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			used to establish noise level limits for the construction workings, and the equipment associated with the development itself. The assessment identifies no likely significant adverse effects and so the relatively low baseline sound level will largely remain in place.
33, 61, 121, 236, 292, 334, 467, 489, 797, 819, 821.	Operational Noise from Infrastructure	There is concern from consultees that an appropriate assessment has not been carried out and that the development will lead to significant adverse noise and vibration effects	The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. The assessment shows that receptors will not experience a significant adverse effect from noise or vibration. The assessment shows that sound from the development will be equal to or below the background sound level at all receptors and so will not be a significant source of sound at any property. This assessment is based upon the PCS units operating close to capacity, which will only occur for a small proportion of the year. During the majority of the time the sound from these PCS units will be less than is shown in the assessment.
893, 910	PROW	Consultees have expressed concern over noise from the development during the construction and operational phase impacting the public rights of way.	The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. The assessment shows that receptors will not experience a significant adverse effect from noise or vibration. The main focus of this assessment is to determine the potential noise and vibration impact of the development on residential receptors. However, a review has been undertaken of the PROW in the area and it has identified only a small number which will cross the Site. It is possible that noise from the PCS units will be slightly audible in some areas of some PROW which cross the Site. However, it is not uncommon for industrial noise to be audible on PROW, as is experienced alongside the Siemens factory in Whitney. Furthermore, receptors on PROW are transient, and so any potential impact experienced by noise from the development, whilst on a PROW, would be for a very short period of time, thereby reducing the magnitude of any impact.
394, 442, 1060	Rain Noise on Panels	There is concern over noise from rain hitting the panels causing an adverse impact on residential receptors.	It is possible that noise from rain hitting the proposed solar panels will be audible during heavy rainfall events. However, during these events, it is likely that any receptor would be indoors. Furthermore, it is not uncommon for rain to cause additional noise when landing on the roof of a dwelling, garage, or any areas of hardstanding, such as pavements, roads, and driveways, and this is accepted by the public. Therefore, it is not considered necessary to consider this potential noise impact further.
350	Noise from Aircraft Increasing	The consultee is concerned that noise would be reflected off the solar panels and would increase noise from overflying aircraft.	Sound from overflying aircraft would only be reflected onto adjacent dwellings when there is perfect alignment between the aircraft, panel, and dwelling, as would be the case if the solar panels were a mirror. Subsequently, any sound which could be reflected would only occur for a very short period of time (e.g. 1 second). Furthermore, in the event of perfect alignment between the three elements, sound from aircraft has the potential to double. This worst-case doubling of

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			sound would lead to a 3dB increase in sound. It is generally regarded that a 3dB increase is only just perceptible. However, in practice, sound will not be perfectly reflected between the aircraft, panel and house, and so the actual increase would be less. Therefore, it is possible that some sound from aircraft would be reflected from overflying aircraft onto adjacent residential dwellings. However, any increase would be only just perceptible, and would occur for a very short period of time.
RR-0102-009 (Bladon Parish Council)	Noise Assessment	There is concern from Bladon Parish Council that an appropriate assessment has not been carried out and that the development will lead to significant adverse noise effects	The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. The assessment shows that sound from the development will be equal to or below the background sound level at all receptors and so will not be a significant source of sound at any property. This assessment is based upon the PCS units operating close to capacity, which will only occur for a small proportion of the year. During the majority of the time the sound from these PCS units will be less than is shown in the assessment. The assessment has been undertaken using the computer noise modelling software SoundPLAN version 9.1. This software includes the topography of the site, including reflections from the ground and structures.
RR-0102-009 (North Leigh PC)	Noise from PCS units and Substations	There is concern that operational phase noise from the PCS units, and the substations will affect residential receptors. Further NLPC have requested that noise during the early morning 'ramp-up' is assessed.	A full noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. The assessment shows that sound from the operational phase of the development will be equal to or below the background sound level at all receptors and so will not be a significant source of sound at any property. This assessment is based upon the PCS units operating close to capacity, which will only occur for a small proportion of the year. During the majority of the time the sound from these PCS units will be less than is shown in the assessment. The assessment also includes noise from each of the proposed sub-stations across the Site. Where the substation has not yet been specified, then a noise limit has been established. This limit has been set so that sound from the development does not cause a significant adverse effect on residential receptors. Further, the assessment includes a consideration of sound from the PCS units 'ramping-up' in the early hours of the morning (e.g. 0500 to 0700). This operational phase assessment identifies that there are no likely significant effects.
RR-1035-6 (Tackley Parish Council)	Construction noise	TPC are concerned about noise during the construction phase	A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference [APP-050], with additional

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			information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. This assessment has identified that the development will not cause any significant adverse effects on noise and vibration sensitive receptors. This assessment includes consideration of noise from construction vehicles. During the construction and decommissioning phases, noise and vibration will be controlled and limited by the Outline Code of Construction Practice [EN010147/APP/7.6.1] (CoCP). This will ensure that no resident experiences a significant adverse effect. The CoCP includes construction phase noise limits, and construction times.
RR-1102-24 (West Oxfordshire District Council)	Noise from PCS units	There is concern from WODC that noise from the PCS units will cause an adverse effect on residential receptors and on PROWs	The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. The assessment shows that sound from the development will be equal to or below the background sound level at all receptors and so will not be a significant source of sound at any property. This assessment is based upon the PCS units operating close to capacity, which will only occur for a small proportion of the year. During the majority of the time the sound from these PCS units will be less than is shown in the assessment. The assessment has been undertaken using the computer noise modelling software SoundPLAN version 9.1. This software includes the topography of the site. The main focus of this assessment is to determine the potential noise and vibration impact of the development on residential receptors. However, we have undertaken a review of the PROW in the area and identified only a small number which will cross the Site. It is possible that noise from the PCS units will be slightly audible in some areas of some PROW crossing the Site. However, it is not uncommon for industrial noise to be audible on PROW, as is experienced alongside the Siemens factory in Witney. Furthermore, receptors on PROW are transient, and so any potential impact experienced by noise from the development, whilst on a PROW, would be for a very short period of time, thereby reducing the magnitude of any impact.
RR-0164-022 Cherwell District Council	Hours of Construction	CDC welcome the use of embedded noise mitigation but have queried the construction hours. CDC recommend that construction hours are limited to the following: 07.30H-18.00H Monday to Friday, 07.30H-12.30H on Saturdays and no time on Sundays, Bank and Public Holidays.	The Applicant confirms that the Outline Code of Construction Practice [APP-232 & 233] (oCoC) at Section 1.8 General Requirements, paragraph 1.8.2, seeks core working hours for the construction phases of the Project, to be secured through the DCO, and that these are proposed to be 07:00 to 19:00 Monday to Saturday. The working hours for the construction of the Solar Farm, have been calculated based on 7am-7pm, Monday to Saturday 52 weeks of the year, this is required to minimise the overall Construction programme period. This will be used bring in people and materials to the four construction compounds, and access sites, in a safe phased manner. This helps manage traffic flow, logistics and welfare for the operatives arriving, working on the site and departing.
RR-0793-066 Oxfordshire County Council	Impact on School Sites	OCC have concerns that the noise and vibration impact assessment does not include schools.	The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference EN010147/APP/6.3,

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			with additional information provided in ES Volume 2 (Figures) [EN010147/APP/6.4], and ES Volume 3 (Appendices)[EN010147/APP/6.5]. The assessment shows that sound from the development will be equal to or below the background sound level at residential receptors and so will not be a significant source of sound. The schools which are located close to the Site boundary have been identified as; • The Marlborough Church of England School • Bladon C of E Primary School • LVS Oxford - Special Education School in Oxfordshire • William Fletcher Primary School • St Peter's C.E. Primary School • Eynsham Primary School These schools are located either away from the Site boundary (e.g. William Fletcher Primary School) or at a greater distance from the Site boundary than other nearby noise sensitive receptors. The assessment identifies that sound from the development will be below the background sound level at each residential receptor which has been identified, and so the impact at the school will be either equal to or less than this potential noise impact, on the basis of distance if the residential receptors are closer in all cases than the schools. Further, the assessment utilises the methodology stated in British Standard 4142:2014+A1:2019 – 'Methods for rating and assessing industrial and commercial sound', which is only applicable to residential receptors.
26. Planning Policy			
61, 63, 79, 123, 161, 199, 199, 201, 204, 210, 241, 242, 243, 248, 258, 262, 284, 292, 295, 296, 303, 321, 322, 327, 378, 383, 384, 386, 415, 427, 431, 442, 457, 469, 474, 496, 536, 583, 611, 611, 691, 698, 711, 718, 745, 766, 766, 786, 806, 827, 828, 833, 872, 878, 882, 884, 893, 901, 912, 926, 927, 928, 938, 939, 958, 977, 986, 991, 995, 996, 1010, 1020, 1022, 1070, 1073, 1078, 1097, 1098, 1098, 1098	Planning Policy	Comments on conflict with planning policy at local and national level, and how planning decisions are taken.	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 7. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS. The PSS sets out the statutory framework for determining applications seeking development consent. Section 104 of the Planning Act 2008 requires the Secretary of State to have regard to the NPS and decide the application in accordance with the NPS.
27. Public Right of Way			
RR-870-004	Impacts on Public Rights of Way	Potential impact of the solar farm on footpaths, including surface deterioration, increased mud problems, and soil erosion due to excavation and rainfall-runoff.	Should the DCO application for the Project be approved, the Applicant will collaborate with relevant statutory and non-statutory consultation bodies, including Oxfordshire Ramblers Association to minimise the impact on the walking environment. The Applicant has aimed to avoid impacts on the PRow network through project design and trenchless techniques, reducing the need for stopping up or diversion of routes.. Where avoidance is not possible, management measures are proposed in the Outline PRow Management Strategy (Annex

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			B of the Outline Code of Construction Practice [APP-232]), secured under Requirement 11 of the Draft DCO [AS-009]. Any proposals to change or enhance PRoW as part of the Project, such as new greenway proposed in the Outline Landscape and Ecology Management Plan [APP-235], will adhere to the requirements of the Highways Act (1980), where applicable, in addition to the requirements of the PRoW Management Strategy, which will be prepared and approved by local authorities post-consent. As stated in paragraph 1.5.25 of Outline PRoW Management Strategy (Annex B of the Outline Code of Construction Practice [APP-232]), surfaces directly affected during construction of the Project and temporary diversion routes would be reinstated to a suitable condition post construction in accordance with the detailed PRoW Management Strategy (post consent). Laying of cable corridors will not be undertaken until a Construction Environmental Management Plan and a Construction Surface Water Management Plan have been approved by the LPA in consultation with the Local Lead Flood Authority (LLFA). This will detail temporary drainage measures to ensure there is no increase in flood risk during construction. The requirement for this is set out within the Outline Code of Construction Practice (CoCP) (APP-234). The design of the Solar PV ensures that any water that would have fallen onto the land in the pre-existing baseline will continue to do so during the Project. A comprehensive literature review of how solar farms effect runoff and mitigation measures used during the design are outlined in the Conceptual Drainage Strategy for the site within ES Volume 3 Appendix 10.2: Conceptual Drainage Strategy (APP-167). Compared to agricultural (arable and livestock) use, solar PV modules are likely to create an overall betterment in surface water drainage than a continuation of the existing use. The primary reason for this is the significant advantage from full year-round organically managed vegetated ground cover within solar PV module. A second environmental benefit of solar PV modules is soil quality improvement from cessation of intensive arable use and organic management of the land. It is expected that soil health will be improved through the Project.
197, 535, 611, 731, 855, RR-0103-002	Inadequate Mitigation for public access or re-routing	The project, if approved, should contain and make provision for significantly improved measures to support local connectivity. The scheme should be an opportunity to significantly improve walking and cycling routes in the area. The Applicant expects the public to be enormously grateful for the addition of a handful of paths and “upgrades” of paths to bridleways, but they give no evidence that this is wanted. PVDP seems to have assumed that they could change footpaths/bridleways without using the current system of consulting local authorities and other interested parties.	The Project includes the provision and maintenance of new permissive paths, cycle paths, and existing Public Rights of Way (PRoW) to create a greenway within the Order Limits, as outlined in the Outline Landscape and Ecology Management Plan [APP-235]. The greenway specification is shown in Figures 7.6.3.2 A-M of the Outline Landscape and Ecology Management Plan [APP-235]. The exact specification will be developed and agreed with Local Authorities as part of the detailed Landscape and Ecology Management Plan, which will be prepared in accordance with the Outline Landscape and Ecology Management Plan [APP-235] and secured under Requirement 6 of the Draft DCO [AS-009]. Mitigation measures, including new permissive paths, cycle paths, and existing PRoW, were presented to Local Authorities and stakeholders for comment during the PEIR (Table 1.3 of Appendix 16.1 Human Health Consultation and Engagement [APP-219]). Feedback from the public consultation process was used to inform the design and layout of new and

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		The enclosing of the PRoWs will also prevent the free roaming of the wildlife in the area and may cause conflict between users, including those with dogs, and the larger wild animals in the area. The developers have proposed a circular walk to the southwest of Cassington. They have not listened to the villagers who have pointed out that this land is unusable for six months of the year because it is under water. The Cassington track is at the heart of the village. With this facility, Cassington residents do not need to use their cars to take themselves, their families, or their dogs for a walk. It is an environmentally rich resource that nourishes community and wellbeing. The Botley West Solar proposal will destroy it.	improved footpaths proposed in the DCO application (Figures 7.6.3.2 A-M of the Outline Landscape and Ecology Management Plan [APP-235]).
54, 84, 104, 119, 143, 187, 206, 229, 231, 233, 254, 276, 346, 386, 388, 391, 394, 417, 418, 442, 448, 464, 467, 492, 556, 586, 600, 718, 770, 810, 814, 869, 907, 938, 939, 996, 998, 1040, 1060, RR-1035-4, RR-0118-001, RR-0205-11	Loss of access	Concerns raised about loss of PRoWs, and access to the countryside, and whether PRoWs will be diverted or stopped up.	The Applicant has aimed to avoid impacts on the Public Rights of Way (PRoW) network through project design and trenchless techniques, reducing the need for stopping up or diversion of routes. Where avoidance is not possible, management measures are proposed in the Outline PRoW Management Strategy (Annex B of the Outline Code of Construction Practice [APP-232]), secured under Requirement 11 of the Draft DCO [AS-009]. Most affected PRoW will remain accessible during construction via managed crossings with banksmen to ensure priority access and user safety (ES Chapter 17 [APP-054], paragraph 17.9.47). Specific PRoW requiring managed crossings are listed in Table 1.2 of Annex B of the Outline Code of Construction Practice [APP-232]. A limited number of PRoW and promoted routes require temporary or permanent diversions, which are generally short and closely follow existing routes, minimizing journey time increases (Table 17.22 of ES Chapter 17 [APP-054]). The locations of these diversions are detailed in Appendix A of the Outline PRoW Management [APP-232]. A comprehensive PRoW Management Strategy, including diversions, will be prepared and approved by Local Authorities post-consent. Following the implementation of this strategy, access to the PRoW network will not be significantly affected during the Projects lifecycle (ES Chapter 17 [APP-054], paragraphs 17.9.47 to 17.9.65).
529, 552, 558, 637, 974, 1092, RR-0103-008,	Reduction in Safety and Accessibility	Concerns regarding impact of safe use of the PRoW network as a result of construction traffic and activity.	During the construction phase, the safety of Public Rights of Way (PRoW) users will be ensured through measures in the PRoW Management Strategy, prepared according to the Outline PRoW Management Strategy (Annex B of the Outline Code of Construction Practice [APP-232]), secured under Requirement 11 of the Draft DCO [AS-009]. These measures include signage, safety fencing, managed crossings, temporary diversions, and regular inspections. Surfaces affected during construction, including temporary diversion routes, will be reinstated to a safe condition post-construction. For the operation and maintenance phase, new permissive rights of way, public footpaths, bridleways, and cycleways within the Project site will be sufficiently wide to safely accommodate users. The design of these new paths is shown in Figures 7.6.3.2.A to 7.6.3.2.M of the Outline Landscape and Ecology Management Plan [APP-235]. The exact specification will be developed and agreed with Local Authorities as part of the detailed Landscape and Ecology Management Plan, which will be prepared in

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			accordance with the Outline Landscape and Ecology Management Plan [APP-235] and secured under Requirement 6 of the Draft DCO [AS-009].
28. Recreation and Amenity			
RR-0134-012	Impacts to allotments	Damage to crops from deer activity, due to the fields being fenced to keep them out of the areas with panels.	As deer are wide-ranging in their habits and movements, it is not considered that significant changes in deer movements will be brought about by perimeter fencing.
4, 5, 13, 194, 250, 295, 300, 393, 440, 442, 491, 493, 500, 515, 534, 564, 572, 581, 584, 585, 654, 655, 672, 677, 712, 755, 785, 805, 809, 840, 845, 862, 922, 938, 941, 957, 960, 965, 978, 991, 998, 1021, 1023, 1028, 1037, 1040, 1053, 1055, 1056, 1087, 1093, 1104, 1105, RR-0092-030	Loss of Public Footpaths and Access	Impacts on public rights of way for recreational activity and loss of access to the countryside.	The Applicant has aimed to avoid impacts on the Public Rights of Way (PRoW) network through Project design and trenchless techniques to install underground cables, preventing the need for stopping up or diversion of routes. Where avoidance is not possible, management measures are proposed in the Outline PRoW Management Strategy (Annex B of the Outline Code of Construction Practice [APP-232]), secured under Requirement [11] of the Draft DCO [AS-009]. Most affected PRoW will remain accessible during construction via managed crossings with banksmen to ensure priority access and user safety (ES Chapter 17 [APP-054], paragraph 17.9.47). Specific PRoW requiring managed crossings are listed in Table 1.2 of Annex B of the Outline Code of Construction Practice [APP-232]. A limited number of PRoW and promoted routes require temporary or permanent diversions, which are generally short and closely follow existing routes, minimizing journey time increases (Table 17.22 of ES Chapter 17 [APP-054]). The locations of these diversions are detailed in Appendix A of the Outline PRoW Management [APP-232]. A comprehensive PRoW Management Strategy, including diversions, will be prepared and approved by the planning waste authority and the relevant highway authority. Following the implementation of this strategy, access to the PRoW network will not be significantly affected (ES Chapter 17 [APP-054], paragraphs 17.9.47 to 17.9.65). PRoWs affected during construction of the Project will be reinstated following completion of the works to ensure that no permanent effects remain and to maintain the connectivity of the wider PRoW network.
29. Site selection and Cable route Alternatives			
4, 18, 26, 41, 48, 48, 50, 68, 75, 87, 93, 93, 96, 100, 101, 105, 109, 117, 128, 133, 148, 152, 158, 173, 187, 199, 204, 207, 208, 214, 224, 227, 227, 235, 237, 248, 252, 252, 267, 290, 301, 322, 322, 323, 332, 333, 334, 366, 380, 381, 383, 388, 394, 404, 414, 423, 431, 463, 464, 478, 496, 499, 543, 551, 554, 557, 558, 558, 574, 574, 585, 587, 592, 611, 616, 632, 635, 641, 643, 644, 651, 651, 667, 668, 679, 690, 704, 712, 720, 726, 730, 730, 732, 734, 745, 746, 748, 753, 759, 766, 767, 780, 797, 809, 811, 813, 814, 822, 826, 829, 833, 835, 837, 840, 841, 842, 845, 852, 852, 868, 876, 884, 884, 885, 889, 898, 902, 910, 912, 919, 920, 923, 927, 934, 935, 954, 958, 963, 968, 978, 986, 989, 992, 993, 999, 1001, 1020, 1021, 1023, 1042, 1056, 1061, 1063, 1064,	Inadequate justification for site location and scale	Comments on inadequate justification for the site location, particularly in Green Belt, and its scale.	NPS EN-3 sets out the factors that will influence an applicant's site selection from paragraph 2.10.18. The policy recognises that there will be a number of factors that are likely to influence the site selection for all solar projects, as well as considerations specific to each individual project. The policy does not set out any absolute criterion that <i>has</i> to be followed when site finding, but does recognise that the capacity of the local grid network a critical consideration for siting a proposed solar farm. Fundamentally, the Applicant has been led by: - Factors that are noted as influencing site selection are set out in NPS EN-3, from para 2.10.18 - Plus guidance relating to the environmental assessment and minimising of adverse environmental effects – set out in section 2.10 of NPS EN-3 The Applicant has followed this policy. The chronology followed and the reasons for the location and scale is set out in Chapter 5; substation location was very important but there was no one overriding or determinative factor that drove the site selection process or size. It was a combination of factors.

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1065, 1068, 1072, 1073, 1079, 1082, 1087, 1088, 1104, 1113, 1113, 1114, 1007, 145, 115			In NPS EN-3, para 2.3.4, it states that <i>'The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in Section 4.1 of EN-1, will not grant consent in any given case.</i> <i>At para 2.3.5, It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure....</i> In NPS EN-3, para 2.3.9 states that as most renewable energy resources can only be developed where the resource exists and where economically feasible... and because there are no limits on the need established in Part 3 of EN-1, <i>the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land).</i> The Applicants approach to site selection is consistent with all relevant aspects of the NPS's. It has responded to 'preferences' in so far as the site search did include brownfield land. It is important to note that NPS EN-3 acknowledges that potential solar farm sites are largely in rural areas (2.10.36), and that the government expects a five-fold increase in combined ground and rooftop deployment by 2035 (2.10.10). NPS EN-1 also expressly provides that critical national priority infrastructure, such as the Scheme, will, as a starting point, meet the requirement for very special circumstances to justify development within a Green Belt (4.2.17). Paragraph 5.11.37 of EN-1 further confirms that very special circumstances "may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources". Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. [APP-042]. These included Site location and scale and Site layout and design. These sections answer in detail the way in which the site was selected. The overall approach is found at paras 5.1.1 to 5.2.10 and then at 5.3.1 to 5.3.3 of [APP-042]. References to the policy context for the consideration of alternatives and how the site was selected, and the factors that influenced this, can be found at paras 5.2.3 to 5.2.10 and again at paras 5.6.1 to 5.6.17. Paras 5.6.1 to 5.6.17 highlight the interplay between factors that the applicant considered. There was no single or determinative factor that influenced the final site chosen or its size; it was a combination of many factors, considered together. Connection capacity at a substation had to be suitable and available or could be made available, but at the same time so was the availability and suitability of land nearby to accommodate a solar farm at scale. Planning and environmental constraints also played a key role in site selection and the scale of the development. See also Applicants Supplementary Statement of Need (PDB-014) which addresses additional reasons for the siting and scale of the solar farm. Better Sites?

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			The Applicant notes that the SofS should not refuse an application on one site simply because fewer adverse effects would result from developing similar structure on another suitable site – all suitable sites may be needed – NPS EN-1 para 4.3.24. Similarly, alternatives that are not commercially viable or physically suitable (para 4.3.27), or proposals that are vague or immature, (para 4.3.28) can be excluded from consideration. Also whilst NPS EN-3, para 2.3.9 states that the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land), (Appendix 2 Table 2 NPS EN-3 Compliance Table, page 59, para ref 2.3.9), the Applicant did, in its search for suitable sites, consider the use of previously developed or brownfield land, but none were considered more favourable than the subject site.
15, 33, 75, 83, 100, 122, 139, 220, 237, 272, 279, 295, 303, 350, 457, 468, 473, 478, 480, 522, 579, 583, 737, 778, 801, 963, 965, 975, 977, 1015, 1071, 1073, 1115	Cable Routes, proximity to sensitive receptors and public infrastructure, and environmental impact of the routes.	Explanation required for cable routes and optionality and impacts	Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. The NPS policy on ‘Alternatives’, is set out in NPS EN-1, para 4.3.15 – it follows the EIA regulations i.e. <i>information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant’s choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.</i> A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. [APP-042] and include Cable corridor route and laying method. These sections answer in detail the way in which the site was selected and how the Applicant has dealt with cable routing (see Figures 5.1 to 5.5 [APP-119 to APP-123]). The Botley West Solar Farm spans three areas: the Northern Site (near Wootton and Tackley), the Central Site (between Bladon and Cassington), and the Southern Site (near Farmoor Reservoir and Cumnor). Electricity is generated as DC, converted to AC at inverters, and collected via 33 kV cables. Power flows from the Northern to the Southern Site, gathering generation at each stage before reaching the new 400 kV National Grid substation near Cowley. To minimise disturbance, larger cable cross-sections are used to reduce the number of cables and overall corridor width, especially where trenchless methods like HDD are used. This single-route (electrical string collection) approach is more efficient and less disruptive than a star connection, reducing cable length, duplication, and losses. Routes were selected based on environmental constraints, technical feasibility, stakeholder input, and full assessments. The corridor includes 14.5 km through farmland, 7.5 km along or beneath roads, and 2.5 km via trenchless crossings.
579; 786; 1026; 248		Local economy disruption and lack of economic benefits to businesses and residents.	The Socio Economics ES Chapter [APP-052] shows that unemployment will reduce and economic output will increase. It is estimated that 424 direct FTE jobs will be created in the local travel study area across all phases. The ES Chapter calculates £17m of Gross Value Added (GVA) for the Study Area during the construction phase, £64.7m during the operation phase, and £17m during the decommissioning phase. The Outline Skills, Supply Chain & Employment Plan [APP-218] also states intentions for the Applicant to work with local suppliers to procure products and services where possible. The Applicant will build upon the relationships

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			formed with Thames Valley Chamber of Commerce and OxLEP to help facilitate this. The Outline Skills, Supply Chain & Employment Plan [APP-218] also states the intent to engage with local residents through 'Local Recruitment' initiatives as well as 'Apprenticeships' and 'Other Workforce Training'. Overall the Project will have significant business economic and resident benefits.
RR-1108-4; 242; 288; 292, 1095; 522	Local Business and Economy	Negative impacts on tourism will impact visitor numbers	The Socio Economics ES Chapter [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption and loss of visitor numbers, particularly during construction. However the overall significance of this effect across all phases is assessed as not significant. Measures aimed at encouraging visitors to the Site include those described in the response beginning with RR-1007-005 below.
RR-1007-028	Inadequate Mitigation or Rerouting	The layout of Blenheim Palace's grounds have been described as not matching the PRoW map (Figure 15.2)	The PRoW maps seen in [APP-052] focus on PRoW routes rather than the footprint of specific properties. They were produced by using national and regional databases of PRoW routes. The effects of the Scheme on Blenheim Palace, including figures showing both the Scheme and the Palace grounds, has been considered in detail in ES Appendix 7.4 Blenheim Palace World Heritage Site – Heritage Impact Assessment.
429; 785		Loss of jobs and business opportunities through displacement	Employment displacement is measured throughout the Socio Economics ES Chapter [APP-052] and the significance of these effects are included within the overall significance of effects. The Outline Skills, Supply Chain & Employment Plan [APP-218] also states intentions for the Applicant to work with local suppliers to procure products and services where possible. The Applicant will build upon the relationships formed with Thames Valley Chamber of Commerce and OxLEP to help facilitate this.
74; 85; 146; 393	Community Food growing Location	Community food growing is seen as a positive as it increases food security, sustainability, community participation and skill development.	Noted. The Applicant welcomes this comment.
203	Community Food growing Location	Concerns over sheep grazing leading to increased meat consumption	Noted. However, much of the arable land is already used for the production of animal feedstock.
86		Economic development should be prioritised in the North rather than the South	The Project is run by private developers who have the liberty to prioritise their development site Applicant has assessed socio-economic impacts of the Project in the ES Volume 1 Chapter 15 – Socio-economics [APP-052]. The assessment concludes there will be a minor beneficial (significant) effect with regard to the Project's impact of employment generation on unemployment rates. ES - Appendix 15.2 Outline Skills, Supply Chain & Employment Plan [APP-218] sets out how the Project will maximise the local benefits of the construction and operational employment creation.
96		More housing should be prioritised rather than a focus on Solar	The Project is not considered to be inconsistent with other planning and policy principles including delivery of new homes. Prioritisation of renewable energy development such as solar is central to policy objectives put forward in National Policy Statements EN-1 and EN-3. within the context of a push for Green Infrastructure as stated within the NPPF. The Planning Supporting Statement [APP-225] outlines the relevant legislative and policy considerations for the Project.

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884		The UK Government requires government departments to follow guidance of HM Treasury's Green Book (1) in applying social cost benefit analysis for major projects. The proposed development of Botley West Solar Farm is a major project by definition: it is on such a scale that the decision is a matter, not for our local councils, but the Secretary of State for the Department for Energy Security and Net Zero. The reason why social cost benefit analysis by that Department is not required for the proposed development of Botley West is that it is being privately, and not publicly, financed. Nevertheless, two fundamental principles of social cost benefit analysis are relevant in assessing that proposal: exploration of the problem of a radically uncertain future, and the justification of the chosen site.	The Project is a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008 as it is a generation station with a capacity of more than 50 megawatts, which means an application to the Secretary of State for a Development Consent Order (DCO) is required. The decision to grant a DCO is made by the relevant Secretary of State, who will consider all relevant matters. There is a level of uncertainty in all Projects; however, there is no evidence of a "radical uncertain future" associated with the Project. Furthermore, as the Project is being privately financed, there is no requirement to justify the use of the chosen site within the context of a social cost-benefit analysis. An assessment of the relevant factors for the site selection is included in the Alternatives Considered chapter in the ES [APP-042]. The assessment highlights that the site selection process has followed relevant policy requirements such as National Policy Statements EN-1 and EN-3. Furthermore, a Heritage Impact Assessment [APP-141] has been undertaken to review the potential for the Project to harm the significance of Blenheim Palace as a World Heritage Site (WHS). This has found that the construction, and decommissioning of the proposed Botley West Solar Farm would result in a minor negative impact on one of the defined attributes which contribute towards the Outstanding Universal Value of the WHS.
383	Community Benefits and Impacts	2. Harmful Impact on Local Communities and Residents Unlike many large-scale solar farms built in uninhabited desert regions, the Botley West project will negatively affect at least 15 parishes and over 50,000 residents. This does not even take into account the thousands of tourists who visit the area each year, drawn to Oxfordshire's historic beauty and rural charm.	The Socio Economics ES Chapter [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption to short-term accommodation businesses due to lower visitor numbers, particularly during construction however the overall significance of effect across all phases is not significant.
RR-0376-8; 558; 610; 248; 252; 292;296; 429; 715; 922; 702; 399; 461; 806; 949; 1061	Local Business and Economy	Loss of agricultural output will have a negative impact on the economy and cultural heritage of the area	The Socio Economics ES Chapter [APP-052] calculates the loss of agricultural output associated with the Project. Approximately £0.6m of agricultural GVA will be lost during the construction phase. Furthermore, the economic output created by the Project will more than offset the GVA lost by the removal of agricultural production during construction, resulting in a net gain in GVA of approximately £29.1m. As the Historic Environment chapter of the ES [APP-044] assesses, no significant residual effects are assessed during construction, operation and decommissioning of the Project. No significant cumulative residual effects on the Historic Environment are assessed during construction, operation and decommissioning of the Project.
RR-0164-024 Cherwell District Council	Local Business and Economy	<i>CDC welcome the assessment of impacts during all phases of the development upon tourism in the area and the acknowledgement that the sensitivity of tourism as a receptor is medium.</i>	Noted
RR-0789-001; RR-0205-11	Local Business and Economy	Businesses in the north of Oxford will lose attractiveness	There is not any suggested evidence that businesses in the north or elsewhere will lose attractiveness. However the Socio Economics ES Chapter [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption to short-term accommodation businesses, particularly during construction however the overall significance of effect across all phases is

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			not significant which includes effects against businesses in the North of Oxford.
365; 552; 1003; 610; 617	N/A	A negative impact on Oxford's cultural heritage tourism and enjoyment	The Socio Economics ES Chapter [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption and loss of visitor numbers, particularly during construction however the overall significance of effect across all phases is assessed as not significant. Furthermore, a Heritage Impact Assessment [APP-141] has been undertaken to review the potential for the Project to harm the significance of Blenheim Palace as a World Heritage Site (WHS). This has found that the construction, and decommissioning of the proposed Botley West Solar Farm would result in a minor negative impact on one of the defined attributes which contribute towards the Outstanding Universal Value of the WHS. The Historic Environment ES chapter [APP-044] concludes no significant residual effects on during construction, operation and decommissioning of the Project.
RR-1007-005; 97; 176, 192, 264, 287; 473; 487; 496; 505; 513; 535; 688; 727; 942; 1003; 1053; 1031; 1077	Reduction in Tourism and Visitor Appeal	The development will have a significant impact on tourism and tourism businesses	The Socio Economics ES Chapter [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption to short-term accommodation businesses due to lower visitor numbers, particularly during construction. However, the overall significance of effect across all phases is assessed as not significant. Mitigation measures aimed to enhance the appeal of the Site include new routes through the solar PV arrays, which aim to encourage visitors by providing: information boards (with details of new routes); wildflowers and hedgerows (for visual screening); children's fun trails and education boards (e.g. on wildlife, heritage and solar energy).
RR-980-004;	Reduction in Tourism and Visitor Appeal	<i>The village of Cassington and surrounding area with its public houses, guesthouses and accommodation attracts tourists and visitors to the hugely popular and culturally rich city of Oxford and Blenheim Palace, which is a World Heritage site.</i>	The Socio Economics ES Chapter [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption and loss of visitor numbers, particularly during construction however the overall significance of effect across all phases is not significant. Furthermore, a Heritage Impact Assessment [APP-141] has been undertaken to review the potential for the Project to harm the significance of Blenheim Palace as a World Heritage Site (WHS). This has found that the construction, and decommissioning of the proposed Botley West Solar Farm would result in a minor negative impact on one of the defined attributes which contribute towards the Outstanding Universal Value of the WHS.
199		Wolfram Research, as the entrepreneur and business owner behind Wolfram Research Europe Ltd--a world-renowned technology and AI company that has been in Oxfordshire since 1990, and specifically Hanborough since 1992, building our prominent and bespoke office in 2011. We appear to represent exactly the kind of organisation the government is building the UK's future economic prosperity on, and we are located in the Oxford-Cambridge Arc that is its focus for driving this forward. Outcome of Botley West proceeding: Wolfram Research is likely to leave West Oxfordshire and relocate much of this business outside the UK.	Noted. The Socio Economics ES Chapter [APP-052] has assessed social and economic impacts of the Project. The only finding of a significant environmental effect is a minor beneficial impact of employment generation on unemployment rates in the Study Area.
22; 23; 97; 143; 169; 177; 202; 208; 210; 213; 249; 333; 338; 340; 429; 490; 558; 598; 633; 785; 639; 686; 722; 730; 785; 786; 845; 876;	Impact on Property and Housing	Solar farms cause a loss of property value	The Socio Economics ES Chapter [APP-052] references a UK study ('Is NIMBYism Standing in the Way of the Clean Energy Transition?' Jarvis,

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902; 979; 1026; 1037; 1095; RR-0135-14; RR-1049-003			2021) which found no clear evidence of an effect on residential property values from solar Projects in the UK. The value of individual properties is not, in any case, a material planning consideration.
RR-1007-029	Reduction in Tourism and Visitor Appeal	Contesting in the sensitivity evaluation of visitor economy. The sensitivity should be higher	Tourism sensitivity is medium because footpaths near the Project are rarely used, main attractions remain popular, and the overall economic impact is strong. The socio-economic challenges are notable but not severe enough to warrant high sensitivity.
30. Summary of Significant Effects			
7, 62, 99, 105, 108, 111, 125, 128, 141, 151, 157, 190, 202, 208, 237, 259, 271, 343, 349, 352, 361, 374, 375, 377, 383, 386, 389, 390, 394, 457, 469, 478, 481, 487, 497, 520, 522, 536, 539, 558, 571, 599, 614, 615, 620, 627, 657, 672, 673, 678, 693, 699, 701, 710, 725, 735, 762, 855, 883, 926, 930, 965, 986, 1002, 1006, 1009, 1012, 1023, 1033, 1066, 1068, 1075, 0164-014	Summary of Significant Effects	Topics covering overall environmental concerns and multiple topics including management, mitigation and cumulative impacts.	A detailed Environmental Statement has been submitted for the Botley West Solar Farm DCO [APP-036 to APP-224]. The approach of the Environmental Assessment is detailed set out in ES Volume 1, Chapter 4: Approach to Environmental Assessment [APP-041]. The subsequent environmental topics have detailed baseline assessment, mitigation and enhancement measures, assessment of effects, cumulative effects and interrelated effects [APP-044 to APP-057] The Site Selection and Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. Consultation has been undertaken at various stages of the DCO process including the PEIR and ES. As per details in ES Volume 1, Chapter 6: Project Description [APP-043] careful consideration has been undertaken to design the project to reduce and minimise environmental effects. Various Management Plans have also been drafted to reduce and mitigate environmental effects [APP-232 to APP-238]. These include, Outline Code of Construction Practice, Outline Operational Management Plan, Outline Landscape and Ecology Management Plan, Outline Decommissioning Plan and Outline Layout and Design Principles. Each of these documents are secured through the respective Requirements in Schedule 2 of the draft Development Consent Order [AS-009]. Within ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057] the Cumulative Effects Assessment (CEA) element of the chapter considers effects on environmental receptors from two or more developments which could occur at the same time and which could result in greater effects than if the Project occurred on its own. Inter-related effects, refer to the interactions between aspect assessments and are considered for 'project lifetime effects' and 'receptor-led effects'. Finally, Chapter 21 - Summary of Significant Effects [APP-058] provides a summary of the likely significant effects (adverse and beneficial) of the Project based on the findings of the Environmental Impact Assessment (EIA). That final chapter identifies the following residual adverse effects only: - Landscape and visual: at winter Year 1 during operation and maintenance from views available at Representative Viewpoints 5b, 5c, 13, 17, 25, 26, 32, 33, 38, 39, 50 and 54. By Year 15 these effects would not be significant. - Landscape and visual: There would be significant effects on users of public rights of way within or immediately adjacent to the Project

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			during operation and maintenance, at completion. By Year 15, once planting matures, these effects would not be significant. - Ecology: The impact of temporary and permanent habitat loss on wintering birds assemblage during construction of the Project. - Agricultural Land Use and Public Rights of Way: Cumulative effects: The permanent loss of agricultural land, including BMV land and land from landholdings (construction only). However, paragraph 3.1.2 of NPS EN-3 acknowledges that <i>"it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts"</i>. Further, paragraph 4.2.15 of NPS EN-1 confirms that <i>"where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts"</i>.
254, 684, 905, 917, 919	Summary of Significant Effects	Topics covering overall environmental concerns and multiple topics including Landscape, Historic Environment, Ecology, Flood Risk and Greenbelt.	In addition to the points raised in the above response, the Applicant has submitted specific chapters dealing with some of the core topic issues raised, including: A detailed Environmental Statement has been submitted for the Botley West Solar Farm DCO. The approach of the Environmental Assessment is detailed in ES Volume 1, Chapter 4: Approach to Environmental Assessment [APP-041]. The subsequent environmental topics have detailed baseline assessment, mitigation and enhancement measures, assessment of effects, cumulative effects and inter related effects [APP-044 to APP-057] The Site Selection and Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. Specifically we have Environmental chapters for [CR1-003] Chapter 7 - Historic Environment [PDB-006] Chapter 8 - Landscape and Visual Impact Assessment [PDB-008] Chapter 9 - Ecology and Nature Conservation [APP-047] Chapter 10 - Hydrology and Flood Risk [APP-054] Chapter 17 - Agricultural Land Use and Public Rights of Way The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [APP-225]. At Appendix 8 to the PSS is the Very Special Circumstances case in respect of that part of the Project that falls within the Oxfordshire Green Belt. The Applicant has also responded in more detail to specific concerns raised in relation to each of the above topics, and others, as part of this document (the Applicant's responses to relevant representations).
31. Supply chain and Employment opportunities			
845	Supply Chain and Employment Opportunities	Concern regarding lack of local SMEs and contractors as part of the construction supply chain	The Outline Skills, Supply Chain & Employment Plan [APP-218] also states intentions for the Applicant to work with local suppliers to procure products and services where possible. The Applicant will build upon the relationships formed with Thames Valley Chamber of Commerce and OxLEP to help facilitate this.
404	Supply Chain and Employment Opportunities	Lack of assurance on Developers capacity to successfully deliver such a project at this scale.	The contract to build the solar farm will be awarded to a suitably qualified and financially robust Engineering, Procurement and Construction contractor. EPC is a turnkey contract requiring

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			delivery of completed construction works. The contractor will have suitable experience of projects of this scale.
333; 18; 41; 86; 309; 516; 618; 827; 853; 965;1077	Supply Chain and Employment Opportunities	Assurances of a transparent ethical supply chain that reduces human and environmental costs.	The Outline Skills, Supply Chain and Employment Plan [APP-218] , sets out how the Applicant will take measures to maximise benefits to local businesses from spending on goods and services at each stage of the Project, minimising transport and emissions. The Applicant will work with Thames Valley Chamber of Commerce to provide a list of local companies that can contribute to the supply chain for BWSF. PVDP is a member of Solar Energy UK, the industry body, and is a signatory to its supply chain sustainability commitment: "We support applying the highest possible levels of transparency and sustainability throughout the value chain, and commit to the development of an industry-led traceability protocol to help ensure our supply chain is free of human rights abuses".
32. Traffic, Transport and Access			
4, 30, 34, 54, 55, 58, 64, 76, 89, 99, 112, 117, 128, 137, 138, 143, 145, 148, 161, 194, 199, 207, 215, 217, 236, 240, 248, 250, 251, 252, 260, 262, 269, 272, 279, 280, 281, 287, 288, 292, 295, 298, 299, 301, 310, 327, 331, 340, 345, 354, 365, 366, 368, 379, 383, 384, 386, 394, 403, 405, 429, 440, 442, 448, 451, 463, 466, 477, 479, 482, 489, 491, 498, 509, 514, 515, 520, 521, 522, 531, 535, 541, 542, 544, 547, 554, 556, 558, 560, 564, 565, 572, 579, 579, 581, 585, 589, 592, 601, 602, 610, 612, 632, 633, 635, 637, 640, 651, 654, 655, 658, 677, 712, 719, 722, 727, 729, 730, 744, 745, 747, 752, 755, 758, 759, 763, 766, 770, 775, 780, 786, 798, 799, 800, 801, 804, 809, 819, 822, 826, 829, 837, 843, 845, 852, 865, 876, 887, 888, 891, 893, 898, 904, 906, 908, 913, 916, 917, 925, 926, 931, 934, 937, 938, 941, 950, 957, 959, 962, 974, 978, 988, 993, 996, 996, 998, 1010, 1019, 1022, 1026, 1029, 1031, 1039, 1043, 1052, 1053, 1055, 1056, 1085, 1087, 1099, 1101, 1101, 1104, RR-0339, RR-0376, RR-0784, RR-0964, RR-1035, RR-0789.	Construction Traffic Impact	Some respondents have concerns on the impact of construction traffic along the road network in the context of current traffic conditions and congestion, road conditions and damage to roads, suitability of roads for access, road safety, installation of cables within roads and potential road closures, other emerging developments and cumulative impacts. Some respondents' concerns in this regard were general in nature and some others cited specific roads or locations including the A40, the A44, the A34, the A4095 through Bladon, Horsemere Lane (Bladon), Heath Lane (Bladon), the A4095 Long Hanborough and North Leigh, Burleigh Road, roads within Cassington, B4044 Swinford Toll Bridge, B4017 Cumnor Road, Denman's Lane (Cumnor), roads within Cumnor (including the Cumnor Village Conservation Area) and the B4027 / A4260 Banbury Road junction.	An assessment of the impact of construction traffic upon traffic and transport receptors is set out in section 12.10 of ES Volume 1, Chapter 12 [APP-049], which has been prepared in accordance with industry standard guidance and good practice and aligns with the approach adopted for similar infrastructure projects. It assesses the impact of construction traffic upon driver delay (congestion, including the impact upon driver delay from installing cables within roads), non-motorised user delay, non-motorised user amenity, severance, public transport delay, road safety (including the B4027 / A4260 Banbury Road junction) and the impact of Abnormal Indivisible Loads on the safety of users of the road network. It concludes that the construction traffic would not result in any significant effects upon traffic and transport receptors. In undertaking the assessments, section 12.7 of ES Volume 1, Chapter 12 [APP-049] and Appendix 12.6 Construction Vehicle Trip Generation Assumptions [APP-204] sets out an access strategy for construction vehicles whereby the Project will be constructed from the compounds using internal access tracks and without reliance upon the public highway as far as possible. There are some fields that cannot be accessed by HGVs using internal access tracks and materials for these fields will be delivered to the compounds and then transferred to those fields using tractors and trailers. This access strategy restricts construction HGVs to only suitable parts of the road network. As part of this access strategy, construction HGVs delivering day-to-day materials will not travel along the A4095 through Bladon, along Horsemere Lane (Bladon), along Heath Lane (Bladon), along the A4095 Long Hanborough, along the A4095 North Leigh, along roads within Cassington, across the B4044 Swinford Toll Bridge, along Denman's Lane (Cumnor) or along roads within Cumnor (including the Cumnor Village Conservation Area). This access strategy is set out as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [APP-232] and is secured by Requirement 11 in Schedule 2 to the Development Consent Order [APP-015]. Section 12.10 of ES Volume 1, Chapter 12 [APP-049] sets out that there would be four transformer deliveries that would be classified as Abnormal Indivisible Loads and thus the number of Abnormal Indivisible Load movements would be irregular. Table 12.20 of ES Volume 1, Chapter 12

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			[APP-049] sets out that a Special Order issued by the Secretary of State for Transport following an application by the appointed heavy haulage contractor will be required to move the Abnormal Indivisible Loads. It also sets out that a route for AILs will be identified (this will be from the port of entry and along the Strategic Road Network and Local Road Network to the Project) as part of the process to receive a Special Order. Notwithstanding, Section 12.10 of ES Volume 1, Chapter 12 [APP-049] sets out assessments on the impact of Abnormal Indivisible Loads using professional judgement and concludes that these would not create any significant effects upon traffic and transport receptors. Section 12.7 of ES Volume 1, Chapter 12 [APP-049] and section 1.9 of the OCTMP [APP-232] sets out that the open cut trenching on highway links is not expected to result in any road closures and would maintain access at all times including for emergency services and for buses. Section 1.10 of the OCTMP [APP-232] sets out a requirement for highway condition surveys to be undertaken to identify any damage that may have occurred to any local roads as a result of construction vehicles and for a remediation strategy to be prepared to remedy any such damage. A cumulative assessment of the impact of construction traffic plus traffic generated from other emerging developments upon traffic and transport receptors is set out in section 12.12 of ES Volume 1, Chapter 12 [APP-049]. It assesses the impact of construction traffic plus traffic generated from other emerging developments upon driver delay (congestion), non-motorised user delay, non-motorised user amenity, severance, public transport delay and road safety. It concludes that the construction traffic plus traffic generated from other emerging developments would not create any significant effects upon traffic and transport receptors.
30, 215, 248, 279, 466, 522, 727, 759, 780, 829, 941, 998, 1029, 1069, RR-0964.	General Traffic Impact	A respondent considered that the impact of the Project would be low since once operational minimal traffic or resources will be required to maintain it. Some respondents had concerns with traffic impacts when the Project is operational.	Section 12.4 of ES Volume 1, Chapter 12 [APP-049] sets out that when the Project is operational it does not require any manned facilities and requires only infrequent maintenance activities that will be undertaken by a light vehicle (typically a 4x4) daily / weekly. It sets out that the potential impact of additional vehicle movements on traffic and transport receptors during operation and maintenance of the Project is unlikely to result in significant effects.
269, 368, 542, 451, 654, 677, 730, 786, 879, 1053.	Pedestrian and Cyclist Safety	Some respondents have concerns on the impact of construction traffic upon the safety of pedestrians and cyclists. Some respondents have set out that there is no provision in the plans for a cycle route/track along Lower Road between Eynsham and Hanborough or along the B4044 Eynsham Road to encourage cycle commuting between Oxford and Eynsham.	An assessment of the impact of construction traffic upon the safety of pedestrians and cyclists is set out in section 12.10 of ES Volume 1, Chapter 12 [APP-049]. It assesses the impact of construction traffic upon non-motorised user delay, non-motorised user amenity, severance and road safety. It concludes that the construction traffic would not create any significant effects upon the safety of pedestrians and cyclists. A pedestrian and cycle route along Lower Road forms part of the accessibility proposals for the Salt Cross Garden Village proposal (West Oxfordshire District Council planning application reference: 20/01734/OUT; planning application submitted and pending approval). The Project would generate negligible demand for cyclists and that demand would not be to a level that requires a new cycle route to be provided along Lower Road. Notwithstanding, the Project will help facilitate the proposed cycle route by not installing any part of the Project along land within the Order Limits that is outside of the adopted highway boundary adjacent to Lower Road and retaining that land for the future provision of the cycle route. This is set out on the Landscape, Ecology and Amenities Plan [APP-228] which shows the

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			future cycle route along Lower Road within the Order Limits. Whilst the Project will not deliver this cycle route, the land required for it is effectively safeguarded by the Project to enable it to be brought forward as part of the Salt Cross Garden Village proposal. A cycle route along the B4044 Eynsham Road has been a community led aspiration that was previously considered but not progressed by Oxfordshire County Council. The Project would generate negligible demand for cyclists and that demand would not be to a level that requires a new cycle route to be provided along the B4044 Eynsham Road. The Order Limits do not include any land outside of the adopted highway boundary along the B4044 Eynsham Road and the Project is not therefore able to dedicate land to help facilitate such a cycle route in this location.
33. Hedgerow			
237, 271, 285, 480, 1104	Hedgerow Planting and Visual Impact	The proposed hedgerows may restrict views along the paths, creating tunnel-like spaces. Additionally, there is no clear information on the exact planting locations of trees and hedgerows, which is essential to assess their visual impact and how they might affect the enjoyment of the home, particularly for children.	The proposed hedgerows are part of a landscape strategy designed to integrate the development into the existing environment and reduce visual impact. Photomontages demonstrate that views are not entirely obstructed, and visual openness is maintained in key locations (Chapter 8: Landscape and Visual Impact Assessment [APP-045]). Planting proposals, including planting layout, are documented in the Outline Landscape and Ecology Management Plan [APP-235] and the Landscape, Ecology and Amenities Plan [APP-228] . These documents outline how planting is distributed across the site, its timing, and how it will be managed and monitored to ensure long-term effectiveness.
245, 384, 384, 386, 394, 755, 822, 908, 957, 1021	Impact of Hedgerow and Tree Removal	Concern that the removal of established hedgerows and trees, including partially mature and potentially ancient specimens, will result in adverse impacts on local biodiversity and established ecosystems. The ecological value of existing vegetation, including its support for insect and bird populations, cannot be immediately replaced by new planting, which may take years or decades to reach maturity. Additionally, new hedgerows may shade adjacent grassland and require long-term maintenance and watering, for which no clear responsibility has been outlined. There is also concern that historically significant routes such as Dornford Lane, lined with veteran trees and hedgerows, will be negatively affected by development and associated infrastructure. Under the Hedgerows Regulations 1997, hedgerows planted as mitigation may be legally protected and therefore not easily removed at decommissioning.	The Project has been designed to retain most of hedgerows, with removal limited to approximately 622 m across 75 locations. These removals are primarily to facilitate access and visibility splays, and in some locations for open trenches where the use of HDD would be unsuitable (Chapter 6: Project Description [APP-043]). The removals are therefore considered essential to the delivery of the Project. Mitigation measures are designed to minimise impacts on hedgerows. Ecologically important hedgerows are being protected by minimum 5 m buffers during construction. The loss is predicted to have a minor adverse effect. The remaining hedgerows are expected to retain their ecological function with suitable management . (Chapter 9: Ecology and Nature Conservation [APP-046]). Protection measures are also applied to protect the veteran trees (15-times-stem-diameter buffer zones). Outline Landscape and Ecology Management Plan [APP-235] includes the creation and management of new hedgerows, grasslands, and other habitats, and these will be monitored annually to ensure effectiveness, including for species such as dormice, birds, and badgers. At decommissioning, no hedgerows are planned to be removed, and all necessary protection buffers will be maintained.
30, 288, 292, 317, 362, 393, 667, 780, 814, 821, 1077	Ecological and Biodiversity Impact	Concern that the proposed development will result in the loss of valuable and ancient hedgerows and trees, which currently support a rich diversity of wildlife. Replacing these with new planting would not quickly restore biodiversity, as hedgerows take years to mature and require consistent watering and maintenance, for which no detailed plan is provided. Additionally, hedgerows should ideally be at least 10 metres wide, rather than the 5 metres	The Solar Farm has been designed to retain most of hedgerows, with removal limited to approximately 622 m across 75 locations. Chapter 9: Ecology and Nature Conservation [APP-046]. The project proposes significant mitigation and enhancement measures including biodiversity net gain. The Project design has been developed such that the extent of net gain possible has been maximised, with a target of at least 70% Habitat BNG. Approximately 26.5 km of new species-rich hedgerows will be planted,

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		proposed. The removal of hedgerows and trees would contribute to a loss of habitat, negatively impacting biodiversity and established wildlife corridors. Concern about the proximity of the project to residential areas, the associated loss of Public Rights of Way, and the absence of absolute guarantees in the Environmental Statement regarding the protection of existing vegetation and adherence to bird nesting seasons.	which will provide extensive new and enhanced habitat for the local invertebrate assemblage with an additional 22 km of existing hedgerows reinforced. These corridors are expected to mature and offer high ecological value over time. The Applicant notes that hedgerows must be at least 30 years old to be considered “important” under regulatory definitions, but the project has been designed to ensure that new plantings will, over the lifetime of the solar farm, contribute significantly to the future extent of important hedgerow habitat (Chapter 9: Ecology and Nature Conservation Sections 9.9.622–9.9.633 [APP-046]). Hedgerow clearance and management will be scheduled outside the bird nesting season wherever feasible. Dormouse habitat, which has been confirmed within the site, will be protected by carrying out vegetation clearance during winter when these species are dormant (Chapter 9: Ecology and Nature Conservation Sections 9.9.663–9.9.665 [APP-046]). Finally, to address long-term biodiversity concerns, a monitoring plan will be implemented to ensure that compensation and habitat enhancement measures—including newly planted hedgerows—are successful in supporting species such as dormice, bats, and invertebrates. Outline of the monitoring plan is in the Outline Landscape and Ecological Management Plan (oLEMP) referenced in Outline Landscape and Ecology Management Plan [APP-235].
1104	Hedgerow Removal and Visual Screening	The developers talk vaguely about planting hedges but give no detail. They say nothing about the age-old hedgerows which will be removed. Some of them date from Medieval times. The visual impact of the solar panels in our area certainly cannot be hidden by any hedge	Hedgerow planting will form part of the landscape mitigation strategy, including 26.5 km of new hedgerows and reinforcement of approximately 22 km of existing hedgerows. Location is outlined in the Landscape, Ecology and Amenities Plan [APP-228]. Chapter 8: Landscape and Visual Impact Assessment Section 8.8.7 and Table 8.20 [APP 045] outline the embedded mitigation measures, including the planting of new hedgerows and reinforcement of existing ones, with the intent of screening views and reducing landscape fragmentation. These are secured through the Outline Landscape and Ecology Management Plan [APP-235] .
34. World Heritage			
4, 18, 24, 30, 64, 79, 89, 116, 117, 124, 143, 182, 184, 187, 198, 205, 207, 208, 217, 229, 237, 245, 248, 249, 254, 272, 279, 285, 286, 287, 288, 290, 292, 295, 300, 329, 332, 334, 336, 338, 339, 341, 342, 343, 363, 365, 366, 383, 384, 386, 392, 394, 403, 404, 417, 428, 434, 448, 467, 478, 480, 482, 487, 489, 491, 492, 496, 502, 503, 504, 505, 510, 513, 522, 526, 533, 538, 543, 547, 551, 552, 558, 564, 566, 569, 571, 577, 579, 581, 586, 589, 592, 599, 601, 602, 610, 616, 626, 627, 631, 632, 633, 634, 639, 641, 644, 646, 651, 652, 654, 660, 665, 671, 677, 690, 714, 718, 722, 727, 732, 744, 748, 753, 755, 756, 766, 775, 780, 784, 786, 789, 794, 797, 798, 799, 801, 806, 810, 812, 819, 821, 822, 832, 833, 834, 835, 837, 841, 843, 850, 852, 859, 860, 863, 865, 868, 873, 876, 887, 897, 906, 908, 912, 913, 915, 919, 927, 928, 934, 948, 949, 950, 954,	Impact on the Blenheim Palace World Heritage Site (WHS)	General comments regarding the scale of impacts on the Blenheim Palace WHS	The proposed solar farm has been carefully designed to ensure that no part of the development would be visible in any of the defined key views out of the Blenheim Palace WHS, or indeed from any location within the WHS. The design of the proposed solar farm also considered the visibility of the scheme when viewed by visitors approaching the Blenheim Palace World Heritage Site (WHS). Some fields directly adjacent to the approach routes were withdrawn from the scheme as a result. This is further described in the Applicant’s assessment of likely impacts and effects in respect of the Blenheim Palace WHS which is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England. The Heritage Impact Assessment identified a likely ‘minor negative’ impact on one defined attribute (Attribute 7) which contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. This is Attribute 7, which states ‘<i>The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of</i>

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960, 965, 969, 973, 978, 980, 983, 995, 998, 1003, 1004, 1007, 1023, 1051, 1055, 1061, 1070, 1088, 1090, 1092, 1105, 1106, 1108, 1110 [World Heritage UK]			<i>the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it'.</i> The overall assessment of likely impacts and effects on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4, [APP-141]). The impact would be time-limited and fully reversible. The sensitivity/value of the WHS is determined as 'very high', resulting in a likely effect of 'minor adverse' significance, which is not significant in EIA terms. The Applicant notes that in their Relevant Representation (RR-0398), Historic England does not disagree with the Applicant's assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4, [APP-141]), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment [CR1-003]. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS. The Applicant also notes that ICOMOS-UK has made a Relevant Representation in respect of the scheme [RR-0413]. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the OUV of the UK World Heritage Sites and their settings is one of their key objectives. ICOMOS-UK state that '<i>the proposed Botley West solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map 'Character of Setting of WHS' on page 50 of Appendix III of the Management Plan</i>'. (emphasis added)
18, 101, 231, 245, 386, 552, 574, 593, 610, 632, 641, 654, 690, 756, 860, 865, 917, 1023, 1088, 1090, 1092, 1108	The risk to the status of the Blenheim Palace WHS	Comments regarding the possible consequential loss of WHS status.	The Applicant is not aware of any comment from any of the key WHS stakeholders which would support the assertion that WHS status is at risk. As set out above, ICOMOS-UK has confirmed that the scheme will not have a direct impact on the outstanding universal value of Blenheim Palace and Park WHS, nor on its setting.
300, 876	Impacts on other World Heritage Sites	Comment that the project impacts on several World Heritage Sites	The Applicant's assessment of likely impacts and effects in respect of the Blenheim Palace WHS is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). No other WHS would be affected by the proposed development. As set out above, there will be no significant effects on the Blenheim Palace and Park WHS.
35. Alternatives and Roofs			
6, 8, 9, 17, 25, 26, 35, 37, 39, 42, 55, 62, 64, 65, 66, 67, 73, 76, 77, 86, 112, 116, 121, 136, 137, 139, 141, 143, 145, 150, 155, 159, 162, 169, 175, 176, 189, 192, 198, 204, 229, 231, 234, 241, 248, 255, 262, 263, 270, 274, 274, 277, 281, 282, 288, 292, 293, 296, 298, 301,	Use of previously developed/brownfield and/or rooftops	Comments of preference or requirement to use rooftops or previously developed or brownfield sites first, before countryside or green belt location	Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. Whilst the Applicant supports rooftop solar, as it can reduce demand, it does not believe the Government's target of 70GW of solar by 2025 can be met rooftop solar or on brownfield site alone [APP-225] (para 3.5.6). NPS EN-1, para 3.3.12, also states that "...<i>Decentralised and community energy</i>

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304, 314, 322, 328, 330, 334, 338, 348, 365, 394, 399, 406, 416, 424, 434, 447, 452, 453, 456, 459, 462, 466, 472, 475, 481, 484, 485, 486, 487, 506, 508, 518, 528, 532, 538, 545, 560, 568, 569, 571, 573, 575, 579, 599, 609, 611, 618, 622, 624, 625, 630, 632, 638, 649, 655, 664, 669, 671, 672, 676, 687, 691, 695, 696, 700, 705, 706, 714, 720, 722, 730, 736, 743, 746, 748, 750, 754, 756, 756, 758, 759, 773, 796, 806, 811, 828, 831, 832, 833, 835, 849, 855, 866, 873, 874, 892, 902, 931, 936, 945, 949, 961, 965, 969, 976, 976, 979, 992, 996, 1011, 1021, 1023, 1025, 1031, 1033, 1047, 1058, 1064, 1065, 1078, 1081, 1085, 1094, 1099			<i>systems such as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the Government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives...."</i> In summary therefore, in line with national policy, whilst decentralised generation has an important role to play in decarbonisation, on its own, smaller scale solar generation, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. Therefore, smaller scale solar, including rooftop solar, must be considered as addition to, as opposed to instead of, the need for large-scale, ground-mounted solar like the Botley West Solar Farm. See section 3.5.6 of Planning Supporting Statement inc. Green Belt Case [APP-225]. In respect of whether there is a sequential test or consecutive approach when it comes to finding development sites in Green Belts, as some IP's claim (i.e. that one has to consider brownfield sites first before selecting Green Belt land), the Applicant's position is that policy in this respect is a '<i>preference</i>' not an absolute '<i>requirement</i>'. This position is explained below. Only in NPS EN-3 para. 2.10.29 and 2.10.31 does it make a reference to this matter. Para.2.10.29 states: "<i>While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land...</i>". At para 2.10.31 of NPS EN-3, it notes the '<i>preference</i>' for development to be on suitable brownfield...land". In NPS policy terms therefore, the Applicant characterises this as a <i>preference</i> in policy terms not a <i>requirement</i>, and even then only <i>where possible</i> and <i>where suitable</i>. To reinforce the point, in NPS EN-3, para 2.3.9, it states that as most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land).
5, 43, 60, 67, 70, 91, 101, 173, 182, 199, 208, 237, 242, 243, 248, 260, 267, 279, 310, 311, 331, 340, 342, 355, 393, 414, 421, 479, 490, 490, 496, 498, 514, 549, 556, 559, 567, 571, 592, 621, 627, 701, 736, 737, 741, 745, 750, 755, 783, 797, 799, 800, 801, 805, 807, 814, 816, 816, 816, 830, 843, 851, 860, 865, 871, 908, 925, 943, 946, 955, 959, 960, 963, 969, 971, 972, 972, 995, 999, 1019, 1022, 1026, 1065, 1065, 1072, 1077, 1105, 1105	General suggestions for alternative approaches	General suggestions for use of alternative technology and/or change in Government policy, or size of site	Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. Alternative technologies Also, whilst the Applicant supports rooftop solar, as it can reduce demand, it does not believe the Government's target of 70GW of solar by 2025 can be met rooftop solar or on brownfield site alone [APP-225] (para 3.5.6). NPS EN-1, para 3.3.12, also states that "...<i>Decentralised and community energy systems such as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the Government does not believe they will</i>

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			<i>replace the need for new large-scale electricity infrastructure to meet our energy objectives...."</i> The Applicant does not consider wind turbines would be appropriate in this location given their visual impact and in particular the likely adverse effect upon the setting of the Blenheim Palace World Heritage Site [APP-225] (Appendix 1, Table 1, para 4.3.29). The Applicant has not actively considered other forms of renewable or low carbon energy e.g. nuclear. Change in policy Some RR also ask questions about Government Policy e.g. the phasing out of fossil fuels and the timing of that, but as PINs has made clear in the Rule 6 letter, Government policy is not a matter for debate during the Examination into the Botley West Project. Size of Sites Developing the Project at its proposed size and with its substantial benefits is an important contribution to meeting the urgent need for renewable energy identified in the National Policy Statements. Even with a Project of this size being consented, and the current solar schemes within the consenting process are approved, there would still be a shortfall from the Government's 2035 targets. Policy references to need for deployment at scale can be found at NPS EN-1 paras. 4.2.2 to 4.2.4. Also see Chapter 5, Alternatives, para 5.5.7 [APP-042]. Other references to scale are found in Table 5.1, page 13 and 17. Further detail can also be found in the Supplementary Statement of Need [PDB-014].
245, 250, 286, 327, 426, 489, 660, 938, 1003, 1010, 1040, 1095, 1096	Lack of alternatives	Comments on lack of alternative sites considered	Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. The NPS policy on 'Alternatives', is set out in NPS EN-1, para 4.3.15 – it follows the EIA regulations i.e. <i>information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.</i> A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. [APP-042]. 1. Do nothing 2. Site location and scale; 3. Site layout and design; 4. Choice of solar array; 5. Cable corridor route and laying method These sections answer in detail the way in which the site was selected and how the Applicant has dealt with cable routing (see Figures 5.1 to 5.5 [APP-119 to APP-123]). The overall approach is found at paras 5.1.1 to 5.2.10 and then at 5.3.1 to 5.3.3 of [APP-042].

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			References to the policy context for the consideration of alternatives and how the site was selected, and the factors that influenced this, can be found at paras 5.2.3 to 5.2.10 and again at paras 5.6.1 to 5.6.17. Paras 5.6.1 to 5.6.17 highlight the interplay between factors that the applicant considered. There was no single or determinative factor that influenced the final site chosen or its size; it was a combination of many factors, considered together. Connection capacity at a substation had to be suitable and available or could be made available, but at the same time so was the availability and suitability of land nearby to accommodate a solar farm at scale. Planning and environmental constraints also played a key role in site selection and the scale of the development. The Applicant has added further clarity on the alternatives considered for the Project in its written summary of oral submissions made at the Issue Specific Hearing 1, submitted alongside this response document at Deadline 1. See also Applicants Supplementary Statement of Need (PDB-014) which addresses additional reasons for the siting and scale of the solar farm. Better Sites? The Applicant notes that the SofS should not refuse an application on one site simply because fewer adverse effects would result from developing similar structure on another suitable site – all suitable sites may be needed – NPS EN-1 para 4.3.24. Similarly, alternatives that are not commercially viable or physically suitable (para 4.3.27), or proposals that are vague or immature, (para 4.3.28) can be excluded from consideration. Also whilst NPS EN-3, para 2.3.9 states that the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land), (Appendix 2 Table 2 NPS EN-3 Compliance Table, page 59, para ref 2.3.9), the Applicant did in its search for suitable sites, consider the use of previously developed or brownfield land, but none were considered more favourable than the subject site.
194, 384, 385, 438, 605, 607, 681, 685, 729, 770, 950, 1091	Inadequate Justification for site location or scale	Comments relating to a lack of justification in relation to the scale and/or location of the Project	The NPS policy on site selection, is not overtly prescriptive, there is no absolute criterion that has to be followed when site finding. Fundamentally, the Applicant has been led by factors that are noted as influencing site selection are set out in NPS EN-3, para 2.10.18 plus guidance relating to the assessment and minimising adverse effects – the applicants assessment section of EN-3. The Applicant has followed this policy. The chronology followed and the reasons for the location is set out in Chapter 5 [APP-042]; substation location was very important but there was no one overriding or determinative factor that drove the site selected or size. It was a combination of factors. In NPS EN-3, para 2.3.4, it states that: <i>“The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in Section 4.1 of EN-1, will not grant consent in any given case”.</i>

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			At para 2.3.5, “It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure”.... The Applicant considered alternative sites and the scale evolved over time in response to planning, environmental and commercial considerations. A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. [APP-042] and included Site location and scale and Site layout and design. The overall approach is found at paras 5.1.1 to 5.2.10 and then at 5.3.1 to 5.3.3 of [APP-042]. Paras 5.6.1 to 5.6.17 highlight the interplay between factors that the applicant considered. There was no single or determinative factor that influenced the final site chosen or its size; it was a combination of many factors, considered together. Connection capacity at a substation had to be suitable and available or could be made available, but at the same time so was the availability and suitability of land nearby to accommodate a solar farm at scale. Planning and environmental constraints also played a key role in site selection and the scale of the development. The Applicant has added further clarity on the alternatives considered for the Project in its written summary of oral submissions made at the Issue Specific Hearing 1, submitted alongside this response document at Deadline 1.
36. Glint and Glare			
217, 248, 252, 255, 292, 303, 388, 428, 444, 478, 522, 554, 566, 574, 586, 588, 610, 651, 675, 752, 780, 798, 819, 837, 1023, 1096	Impact on Aviation and Airfields	Comments regarding the potential for Glint and Glare impacts on aviation including at Oxford Airport and RAF Brize Norton.	The impact of Glint and Glare upon nearby aviation has been assessed within the Solar Photovoltaic Glint and Glare Study [APP-128] (Sections 7.2 and 8). The assessment has been carried out with reference to previous FAA guidance, which established a methodology of assessing the Air Traffic Control Tower and 2-mile approach paths for each runway. Further potential impacts upon Oxford Airport have been considered within the Technical Aerodrome Safeguarding Report [APP-128]. The Applicant continues to engage with Oxford Airport on the Project. We are not aware of any evidence of solar farms causing significant radar interference or other impacts upon civil or military radar. RAF Brize Norton is located over 13km from the nearest solar panel area. Significant glare or other aviation impacts are not predicted to be possible at this range.
292, 466, 675, 1088	Impact on Road Traffic	Comments regarding the potential for Glint and Glare impacts on roads surrounding the project.	The impact of Glint and Glare upon nearby roads has been assessed within the Solar Photovoltaic Glint and Glare Study [APP-128] (Section 7.3). Roads within 1km of the proposed panels have been assessed, in accordance with Pager Power’s Glint and Glare Guidance (Fourth Edition). Detailed modelling is not recommended for local roads, as lower traffic volumes are predicted.
333, 467, 685, 998	Impact on Residential Amenity	Comments regarding the potential for Glint and Glare impacts on residential amenity at dwellings surrounding the project.	The impact of Glint and Glare upon residential amenity has been assessed within the Solar Photovoltaic Glint and Glare Study [APP-128] (Section 7.4). The assessment considers a height of 1.8m for modelling based on the ground floor of a typical dwelling, as it is considered that this is the primary

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			living space for most dwellings. Glare towards upper floor is considered within the analysis where relevant but is considered less sensitive as most people spend the majority of daylight hours in primary living spaces on the ground floor.
867 (RAF Brize Norton)	Impact on Aviation and Airfields	Under UK Military Aviation Regulations, as Aerodrome Operator, I am charged with providing a Safe Operating Environment at both RAF Brize Norton and RAF Weston on the Green. Due to the location, I have interests (and possible concerns) about the site location, orientation and its effect on the safe operation of aircraft. Whilst not exhaustive, the concerns primarily extended to; "glint and glare", changes in wildlife patterns, and interactions with Primary Surveillance Radar equipment.	Glint and glare assessments for aviation receptors are typically undertaken for licensed aerodromes within 10km of a proposed solar development. Geometric modelling for General Aviation aerodromes is typically required within 5km of a proposed development. RAF Brize Norton is located approximately 14km from the closest panel area and has therefore been considered at a high-level within the glint and glare study. Any solar reflections towards pilots approaching runway threshold 25 will be outside a pilot's primary field-of-view. This level of glare is acceptable in accordance with the associated guidance and industry best practice. It is also predicted that any solar reflections towards pilots approaching runway threshold 07 would have intensities no greater than 'low potential for temporary after-image'. Based upon site size, distance, and previous project experience, this level of glare is acceptable in accordance with the associated guidance and industry best practice. It can be reliably predicted that personnel within the ATC tower will not experience solar reflections. This is based upon ATC Tower height, the distance to the proposed development, and previous project experience. Due to the low-lying nature of the panels, the significant separation distance and intervening terrain, it is not predicted that these will have any technical impact upon the radar more than any other similarly sized object at this distance, nor would they be tall enough to affect the radar coverage for the radar at RAF Brize Norton.
0793 (Oxfordshire County Council)	Impact on Schools	Glint and Glare Matters OCC Property has reviewed the contents of the Glint and Glare Report (Volume 3, Appendix 4.4) and has some concerns regarding the impact of the proposed solar panels creating glint and glare issues to the playing area and building of both the preschool and primary school. The technical study has not identified either the pre-school or primary schools as sensitive receptors, and therefore it is difficult to ascertain whether the proposed scheme will produce solar reflections that will have a detrimental impact on the staff and children of the primary schools and pre-school. Children spend a considerable amount of time outside, and it is therefore critical to ensure that the playing areas for the primary schools and preschool will remain a safe space for the children. Paragraph 193 of the NPPF highlights that under the 'agent of change' principle, those responsible must do all they can to ensure that new development will not have an adverse impact on the facilities of the primary schools and preschool and the children that are under their care. Therefore, OCC Property would need to be satisfied that the overall level of intensity of solar	Commercial and educational properties are not typically considered within the standard methodology. This is because there is lesser significance on amenity compared to a dwelling as these properties are not inhabited permanently. Pager Power has considered Yarnton Preschool, William Fletcher Primary School, and Cumnor C of E Primary School alongside the geometric modelling and it can be determined that no impacts are predicted towards these schools. Any predicted solar reflections towards Yarnton Preschool and William Fletcher Primary school will be screened such that significant views of the reflecting panel are not possible. Solar reflections are not geometrically possible towards Cumnor C of E Primary school as the establishment is located due south of the panel area.

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		glare observed by children and school staff would be limited. As a consequence, OCC Property would appreciate if the technical study that was undertaken to inform the Preliminary Environmental Information Report could be updated in order to assess the glare and glint impacts on the Yarnton Preschool, William Fletcher Primary School, Cumnor C of E Primary School and their associated playing areas to ensure that they will not be adversely impacted by the scale and proximity of the proposed scheme. OCC Property would also like to note that there is a planning application(21/03522/OUT) and appeal APP/C3105/W/23/3329587) that are currently awaiting decision, which concern the land immediately to the north of the William Fletcher Primary School. Should either the planning application or appeal succeed, then approximately 1.7 hectares of playing pitches and amenity space will be provided to the William Fletcher Primary School to enable its expansion. OCC Property would therefore be grateful, if the technical study were to also assess the glare and glint impacts on the land that is being proposed to form the new playing area of the school. OCC Property will not support proposals, where they could prevent William Fletcher Primary School from fulfilling its educational functions, including potentially expanding its facilities on the land that is shaded purple below.	
788 (Oxford Aviation Services Limited)	Glint and Glare Study and Technical Aerodrome Safeguarding Report	Glint/Glare (Glint and Glare Study and Technical Aerodrome Safeguarding Report There are various assumptions made in the report that will need to be confirmed (definitively) and monitored through design development, including the assumed cab height of the Air Traffic Control Tower (ATCT) which is not evidenced and the orientation, height and angle of panels. The analysis approach for the ATCT found that “green” glare was possible at the ATCT. Under FAA guidelines this is considered an “ocular impact” and requires mitigation. Several existing mitigation factors are noted, but these are not appropriate as detailed below: - “The reflection source is partially screened by vegetation” – The screening approach is currently unclear and additional information is required to confirm if any vegetation which is assumed to shield the ATCT will remain once the development is constructed, can be maintained and if this will be year-round foliage. The appropriateness of vegetation, in proximity of	The developer is currently engaging with London Oxford Airport separately regarding glint and glare concerns towards the ATC Tower.

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		an airfield, that might increase risk of bird strikes must also be considered. - “The source more than 1 km from the ATCT” – This is not considered mitigation in the FAA context. - “The sun would also be low in the sky at the time the glare was predicted” - This is also not considered mitigation in the FAA context as it is noted that ATCT’s have pull down screens to block low angle sun, however they are unable to pull down far enough to block the reflection from PV panels on the ground. Additional analysis is required to understand how often the sun would be below the shades and glare from the PV panels is possible. Further to the results above, the Airport consider that the panels which are predicted to reflect on the ATCT should be removed from the proposed development. The Pager Power assessment also indicates that full analysis details are available upon request. This is urgently required to understand the predicted impacts at London Oxford Airport’s ATCT and beyond.	
1007 (Stop Botley West Campaign Limited (“SBW”))	Glint and Glare Study	Public Rights of Way (PRoWs) 3.4.19 NPS EN-3 sets out that the Secretary of State should assess the potential impact from glint and glare on nearby homes, motorists, public rights of way and aviation. The submitted Glint and Glare Study [EN010147/APP/6.5] considers impact on road traffic safety only but there is no wider consideration of visual receptors in this study or the LVIA. Main Conclusion (Landscape) 3.4.20 As a result of the above deficiencies, the solar arrays are proposed in locations where the potential impact has not been considered in enough depth and the resulting mitigation is simply to seek to minimise the visibility of the panels. The mitigation proposed fundamentally and adversely changes the physical and perceptual qualities of the landscape and the experience for the visual receptors. The Project design has therefore been inadequately informed by landscape constraints and has not taken approach where the natural landscape and the receptors within it are the framework for shaping the design of the project.	In Pager Power’s experience, any potential impacts upon pedestrians/observers PRoW from glint and glare are not considered significant. This is because: • The typical density of pedestrians on a PRoW is low in a rural environment; • Any resultant effect is much less serious and has substantially less severe consequences than, for example, solar reflections experienced towards a road network whereby the resultant impacts of a solar reflection can be much more serious to safety; • Glint and glare effects towards receptors on a PRoW are transient, and time and location sensitive whereby an observer could move beyond the solar reflection zone with ease with little impact upon safety or amenity; • There is no safety hazard associated with reflections towards an observer on a footpath. Any effect will be considered to be of a low magnitude because: • If effects are possible and unscreened they would typically coincide with direct sunlight. The Sun is a far more significant source of light; The reflection intensity is similar for solar panels and still water (and significantly less than reflections from glass and steel) which is frequently a feature of the outdoor environment surrounding public rights of way. Therefore, the reflections are likely to be comparable to those from common outdoor sources whilst navigating the natural and built environment on a regular basis. Therefore, no significant impacts are predicted upon PRoW.
1007 (Stop Botley West Campaign Limited (“SBW”))	Impact on Residential Amenity	Residential Amenity 3.7.1 Paragraph 2.10.27 of the Planning Supporting Statement recognises that national policy in in respect utility-scale solar identifies two principal areas of impact to	The Glint and Glare study includes a mitigation strategy which details the locations where screening is required to ensure that sensitive receptors do not experience a significant impact.

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		residential amenity. Firstly, in relation to visual amenity and secondly, in relation to glit and glare. It is stated in the Planning Supporting Statement these matters are considered in the Landscape and Visual chapters of the ES, but this is not the case. A Glint and Glare Study [EN010147/APP/6.5] is included as Appendix 4.4 to the ES sets out that solar reflections are geometrically possible to 632 of the 699 dwellings assessed. Table 7.4.2 contains discussion of impacts but in most cases relies on “existing and/or proposed vegetation” to reach the conclusion that there is no impact or mitigation required. 3.7.2 Firstly, if proposed vegetation is relied upon to screen the impacts of glint and glare then mitigation is clearly required for more than just the receptors identified in the Table as expressly requiring some sort of additional screening. Secondly, the mitigation measures proposed are vague and lack specificity regarding implementation, effectiveness and maintenance. Where detailed mitigation measures are discussed, it is only vaguely described as a “vegetation or a fence” without any clear specifications on height, density, placement or future maintenance. It is therefore unclear how the recommendations of the Glint and Glare study have been transposed into the landscape design of the Project. For example, there is no detailed implementation plan to provide assurance of the mitigation’s effectiveness nor consideration of the fact that proposed vegetation would clearly take some time to mature	The implementation of the screening is tied into the outline Landscape and Ecology Management Plan [APP-235], and the detailed design of the landscape required by the Works Order No. 8 in the draft DCO [APP-015].
37. Trees, Plants and Flora			
147, 252, 343, 560, 566, 736, 1003	Loss or Removal of Existing Trees and Hedgerows	Sensitivity is required to flora and fauna, so as not to destroy mature trees. Trees should not be removed for this application. The ancient woodlands at Pinsley Wood, Burleigh Wood and Bladon Wood are scattered with many notable, veteran and ancient trees. Dornford Lane, an ancient drovers road, boasts a huge wealth of well established hedgerows and veteran trees, and will be dramatically disrupted by the installation. The development would casus damage to important trees. Many veteran trees are at risk of being destroyed to allow for the cabling associated with this project, and the risk of damage to veteran and other trees that may be caused whilst digging trenches for the major AC cabling, including the protected meadow near the Swinford toll bridge, is a concern and seems to have been glossed over.	All trees, woodland and important hedgerows (with the exception of small areas required for vehicular access) are retained. Significant new hedgerow, tree and woodland planting will occur through the Project as set out in the outline Landscape and Ecology Management Plan is provided in EN010147/APP/7.6.3). A survey of veteran trees has been undertaken presented in ES Volume 3 EN010147/APP/6.5 Appendix 9.14, the necessary buffer zones incorporated. Following scheme evolution, a small amount of hedgerow removal will be required (circa 700m). However, this will be mitigated through the provision of extensive new hedgerow planting and reinforcement elsewhere on site. 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.

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RR-1086-22 Vale of White Horse District Council	Arboricultural impacts	The site and its surroundings contain trees, hedgerows, and designated Ancient Woodland that collectively contribute positively to the rural character of the area. The trees are not currently protected by way of Tree Preservation Order (TPO) or within Conservation Area designation. VWHDC is satisfied that the outlined tree survey methodology, which aligns with BS5837, is appropriate in principle. However, a comprehensive survey does not appear to be provided for the Southern Site Area or Lower Cable Route (Section 5). As a result, it is not possible to provide informed comments on the current layout proposals due to insufficient information. It is noted that the Ancient Tree Inventory indicates the potential presence of at least one tree of veteran status within the site and its surroundings. This should be accounted for in the final tree survey. The current plans suggest a minimum buffer zone of 15 metres is proposed for the designated ancient woodlands adjacent to the site. It is recommended that the Forestry Commission (FC) be consulted to determine whether this minimum buffer zone is adequate to protect this irreplaceable habitat. Approval of the design layout should not be considered feasible until the necessary surveys are made available. The Arboricultural Impact Assessment identifies potential conflicts with trees (Sections 5.16 5.17), and this information should inform the design, specifically, the placement of substations, cabling, and access road etc, to ensure the retention of high-value trees. While the overall arboricultural methodology outlined in the Arboricultural Method Statement (AMS) is acceptable in principle, it is not appropriate for this matter to remain unresolved as is suggested in section 6.3 of the AMS. In accordance with BS5837:2012 (Trees in relation to design, demolition and construction), the design, construction methods, and implementation of tree protection measures must be agreed upon prior to finalisation of the design layout and the commencement of works.	During detailed design targeted surveys of areas where clashes are likely between the proposed scheme and trees/ hedgerows, will be carried out in order to fully assess the impacts of the proposed scheme. A Veteran Tree Survey has been carried out across the site which identified and located over sixty veteran trees and three veteran tree groups. These trees and their veteran tree buffer will be shown on all subsequent plans. A 15m buffer around all ancient woodlands has been applied following current UK guidelines. Targeted surveys, AIA and AMS will be produced during detailed design as the impact of the proposed cable route cannot be assessed until the route of the cable is known. The retention of trees has been a material factor when designing the proposed scheme and the retention of all high value trees will be sought. Targeted AIA/ AMS will be produced during detailed design. These will provide more detail on tree retention/ removal and proposed protection/ damage mitigation for any works within each targeted location.
RR-0793-008 Oxfordshire County Council	Arboricultural Impacts.	Following review of the application, no additional arboricultural information appears to have been submitted since the previous consultations. In the absence of the additional information requested,	High quality and significant features have been assessed, including ancient woodland and veteran trees. The design of the solar scheme has sought to counteract the need for a full survey of ALL trees, by providing consistent buffers to hedgerows and tree

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		the application cannot be supported in arboricultural terms.	groups across the proposals. Therefore, by-design, tree protection is part of the solar schemes design standard. Further arboricultural information will be produced following consent and once detailed crossing locations, cable and service designs are available. This will give a greater level of detail about the possible impacts upon trees, allowing focused surveys to be tasked. This scale of survey is proportionate to the likely possible impact upon trees and woodlands.
RR-0793-018 Oxfordshire County Council	Impacts on mature vegetation.	1.7 As outlined previously the cable trenches and access points have the potential to cause the loss of existing characteristic vegetation including mature trees and hedgerows. Such losses have the potential to significantly affect local character and views not only during construction but also in the long-term as mature vegetation cannot be readily replaced by new planting. 1.8 EN-3 states in para 2.10.101 “The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate”. Impacts on vegetation are proposed to be addressed through Strategic Arboricultural Impact Assessment and Method Statement, however, OCC’s arboricultural officer considers this provides insufficient detail with regard to the retention and removal of trees and hedgerows to allow a judgement on related impacts. 1.9 It is important that vegetation removal is understood and properly mitigated, with processes put in place to ensure any vegetation loss is agreed with the relevant parties prior to any works being carried out. This should clearly relate to hedgerow removal plans and Arboricultural Impact Assessment, and this must also include vegetation removal or works to facilitate wider highways and access works.	The retention of trees and hedgerows will be a priority during detailed design, especially when determining potential cable routes and access points which will be micro-sited and designed in detailed upon consent. Where possible existing access points will be utilised, and any trenching will be located outside of tree and hedge RPAs. If the proposed scheme does need to cross through any tree groups or hedgerows, the ‘Path of least resistance’ will be used in order to maximise tree and hedgerow retention. Due to the nature of solar farm construction, the majority of the proposed scheme will have a low impact on the trees and hedgerows within the scheme, with tree and hedgerow removal likely to be relatively minimal. Further information will, however, be provided, on tree retention and removal, during the detailed design phase. Following detailed design, the full impact of the proposed scheme will be assessed, and this information will be used to inform suitable mitigation planting. This information will be given to the relevant parties prior to works being carried out.
RR-0793-044 Oxfordshire County Council	Arboricultural Comments	4.1 Following review of the application, no additional arboricultural information, which was requested following the Statutory Consultation, appears to have been submitted. Therefore, our previous arboricultural comments in OCC’s responses dated 8 February 2024, 9 August 2024 and 12 September 2024 are still relevant and the further detailed arboricultural information previously requested is required to address the comments. These comments are reproduced below our arboricultural comments on the draft DCO. In the absence of the additional information requested, the application cannot be supported in arboricultural terms. Draft Development Consent Order	High quality and significant features have been assessed, including ancient woodland and veteran trees. Further arboricultural information will be produced following consent and once detailed cable and service designs are available. This will give a greater level of detail about the possible impacts upon trees, allowing focused surveys to be tasked. Following detailed design, once the crossing locations and cable route(s) is set and the nature of any removals works is known, this information will be shared with the Highway authority and consent will be sought. The scheme will seek to retain and protect any trees with Tree preservation orders, however, any trees with Tree Preservation Orders that require works, will be identified and listed within future arboricultural reports following detailed design.

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		4.2 Article 38(6) (felling or lopping of trees and removal of hedgerows of the draft development consent order) [AS-009] states the undertaker may not “fell or lop a tree or remove hedgerows within the extent of the publicly maintainable highway without the prior consent of the highway authority”. 4.3 OCC support this and consider it essential that written consent must be given by the Highway Authority before any works are carried out, including pruning, felling or works to tree or hedgerow roots, in relation to vegetation in the publicly maintainable highway. 4.4 With regards to article 39 (trees subject to tree preservation orders), OCC will await the comments from the District Council Tree Officers before commenting further.	
RR-0793-045 Oxfordshire County Council	Previous arboricultural comments in OCC’s responses dated 8 February 2024, 9 August 2024 and 12 September 2024.	Oxfordshire County Council’s response to Botley West Solar Farm targeted consultation (15th August to 15th September 2024) on single Order limit change within the Central Site to accommodate cable routing around a veteran tree – 12th September 2024 Thank you for consulting Oxfordshire County Council (OCC) on the above consultation. All matters raised in OCC’s previous consultation responses continue to apply. As advised previously, with regard to arboricultural matters insufficient information has been submitted to date and more detailed arboricultural information including tree surveys and arboricultural impact assessments is required before detailed assessments can be made by OCC. Specifically in relation to the above proposed change, as no tree survey or arboricultural impact assessment has been submitted in relation to this, it has not been possible to determine accurately the impact that the proposal will have on the adjacent veteran tree. As a result, it has not been possible to assess the impact that this change would have in relation to compliance with Forestry Commission and Natural England standing advice in relation to veteran trees shown below and section 186 of the NPPF. The consultation material states that the previous proposals had assumed the underground cable would be installed beneath the veteran tree; this would be contrary to the standing advice and NPPF section 186 and cannot be supported. Standing	High quality and significant features have been assessed, including ancient woodland and veteran trees. Further arboricultural information will be produced following consent and once detailed cable and service designs are available. This will give a greater level of detail about the possible impacts upon trees, allowing focused surveys to be tasked. A “Veteran Tree Survey” has been carried out and submitted in order to inform detailed design so that they can be identified and protected. Further assessment of the impact the proposal will have upon these trees will be supplied following detailed design when more details of the cable route are known. NPPF 186: refers to coastal developments but it is assumed that OCC was referring to NPPF Section 193 c) ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;’ No veteran trees are proposed for removal, nor is the removal of any trees within an ancient woodland proposed. The plans provided with the veteran tree survey show the buffer zones around veteran trees which have been calculated following current UK guidance. Proposed cables will all be routed outside of any veteran tree or ancient woodland buffers unless absolutely unavoidable. Cables that pass below any veteran trees or ancient woodlands will be installed using trenchless techniques at a depth greater than 2m in order to avoid any potential root involvement, unless there is any more practicable suitable routes through the RPA that avoid potential damage to roots (Such as being laid within existing ducting/ within the structure of an existing road) The proposed scheme currently does not warrant an extension to the standard 15m buffer around ASNW. This will however be further assessed following detailed design.

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		Advice: 'For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area' (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-andveteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigateimpacts-and-compensate-as-a-last-resort). The proposed change may also affect the ancient woodland to the north and the impacts on this woodland should also be assessed. The Applicant should be aware of the following standing advice in relation to ancient woodland buffers: 'For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic' (https://www.gov.uk/guidance/ancient-woodland-ancient-treesand-veteran-trees-advice-for-making-planning-decisions#avoid-impacts-reducemitigate-impacts-and-compensate-as-a-last-resort).	
RR-0793-046 Oxfordshire County Council	Reproduced OCC Arboricultural Comments from letter dated 9th August 2024 (Oxfordshire County Council's Response to Botley West Solar Farm Targeted Consultation (14 June to 28 July 2024)).	OCC's previous arboricultural comments continue to apply. In addition, the proposed changes have the potential to have further arboricultural impacts, including impacts to trees, hedgerows and to woodlands, including ancient woodlands which is an irreplaceable habitat. Without the detailed arboricultural information requested in our previous comments an accurate assessment cannot be made."	Further arboricultural information will be produced following detailed design. This will give a greater level of accuracy about the possible impacts upon trees. In targeted locations.
RR-0793-047 Oxfordshire County Council	Reproduced OCC Arboricultural Comments from letter dated 8 February 2024 (Oxfordshire County Council's Response to Botley West Solar Farm Phase 2 Consultation (closing date 8th February 2024))	Document reviewed: Strategic Arboricultural Impact Assessment and Method Statement dated 30 November 2023 Volume 3 Appendix 8.3 Impact to Trees and Woodlands It is acknowledged that this proposal covers a very large area and that in section 1.4 of the report it states 'Due to the wide spreading nature of the site and the inherent low impact of solar farm installation, a full site survey was deemed impractical and unnecessary, however, a walkover survey of the proposed cable routes between sites was carried out to help inform the best route for the cable to take'. However, without a detailed survey of all trees and woodlands adjacent to all	An underpinning part of the solar schemes design provides buffers to all hedgerows and woodlands. Therefore, by-design reducing / removing tree impacts have been integral to the schemes design. Following detailed design, potential clashes between the development and trees will be identified and targeted BS5837:2012 surveys of high-risk areas will be carried out. This information will feed into targeted AIA/AMS that will detail tree loss/retention and protection measures required in each of these identified areas. Locations where the cables routes clash with trees and hedgerows will be identified and assessed within the targeted AIA/AMS following detailed design. The proposed scheme will be situated outside of any veteran tree or ancient woodland buffers unless absolutely unavoidable. If required, cables will be installed using trenchless techniques at a depth greater than 2m in order to

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		works that have the potential to impact on these features, it is not possible to make an accurate and detailed arboricultural assessment of the impact of this proposed development. A detailed arboricultural survey would need to be completed in order to provide accurate comments on realistic tree related implications of the proposal. As shown within the report, between sections 5.13 – 5.17, each section (1-5) has the potential to have significant impacts, particularly the high voltage cables, where it states tree removal will be most likely. It is noted within the report that it refers to Ancient Woodland in section 2.23 and the requirement to provide suitable buffers in accordance with Forestry Commission and Natural England standing advice. The Applicant is advised that 15m is a minimum requirement for ancient woodland buffers and the guidance states ‘Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone’ (https://www.gov.uk/guidance/ancientwoodland-ancient-trees-and-veteran-trees-advice-for-making-planningdecisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort). It is not clear from reviewing the report if an assessment has been made on whether any veteran or ancient trees will be impacted by the proposal. A detailed arboricultural survey would need to be completed to determine the presence and the precise location of any veteran or ancient trees that may be present on the site and, potentially impacted by the proposals. It is noted that within the key to the plans it refers to a veteran tree buffer 15m offset and veteran tree is shown within the Glossary at Appendix F. However, in accordance with Forestry Commission and Natural England standing advice buffers for ancient and veteran trees should be calculated as: ‘For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area’ (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-andveteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigateimpacts-and-compensate-as-a-last-resort).	avoid any potential root involvement, unless there is any more practicable suitable routes through the RPA that avoid potential damage to roots (Such as being laid within existing ducting/ within the structure of an existing road). The proposed scheme currently does not warrant an extension to the standard 15m buffer around ASNW, the end land use (i.e. solar farm) is low use, low impact and limited pressure upon the nearby woodlands. This will however be further assessed following detailed design. A Veteran tree survey has been carried out and the locations and buffers of all veteran trees on site have been given. The 15m Buffer on the tree survey plans refers to ancient woodlands and has incorrectly been labelled as veteran trees. This will be corrected on any future plans provided. All ASNW and veteran tree buffers have been calculated following the appropriate UK guidance. 193c) https://www.gov.uk/guidance/national-planning-policy-framework Currently the proposal requires no loss or deterioration of any ASNW or veteran trees. The impact on these will be further assessed in future arboricultural reports during detailed design. Agreed, for this reason, arboricultural impact assessments will be updated following detailed design.

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		An assessment of the impacts of the proposal on ancient and veteran trees is therefore essential and the Applicant should be aware of section 186c of the NPPF updated December 2023, which states: '186. When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶⁷ and a suitable compensation strategy exists;' (https://www.gov.uk/government/publications/national-planning-policyframework--2). It is not clear from the information submitted where the exact routes of the high voltage cables will be located. It is noted from reviewing the various plans within the report, it appears to show a wide route located within the roads. However, more specific details of its exact location are required before a detailed arboricultural impact assessment can be made. As locating the cable route in verges would be completely unacceptable due to the significant impact that would have on the roots of a very significant number of trees that are located adjacent to the roads. The routes for cabling between the separate blocks of solar panels also don't appear to be shown on the plans. Therefore, the impact of these works is unknown and has the potential to be very significant, being essential that it is accurately assessed. There also appears to be various areas on the plans where the route for the cables will have significant impacts to tree root protection areas (RPAs), that would appear avoidable by relocating the route to avoid RPAs. Whilst the specific routes have not been confirmed, it has the potential to impact on the following trees, where its shown within the RPAs of the following trees: T92, T94, T95, T96, T110, H16, T160, T161, T173, T175, T178, T185, T186, T187, T199, T204, T206, G42, T215-T217, T222, G46, T229, T230-T234, T237, T238, T248, T249, T271, G60, G59, T279, T283, T284, T286, T287, G70, T394, T395, T404, T405, T406, T407, T408, T410, T411, T415, T416-T421, T422-T424, T426, T428-T430, T432, T434, T437, T438, T439-T446, G101, T449, T456, plans to the South of Tree Survey (Page 13 of 16) seem to be missing and therefore, the impact of the route for cables further South is not defined, meaning the impact has the potential to be significant.	More site-specific information will be provided in targeted AIA/AMS during detailed design. Micro-siting and/or replacement tree planting may form part of the mitigation strategies. Scenario 6 will be amended in the AMS during detailed design. This amend will be to remove scenario 6 and replace it with a scenario where the need for excavation within the RPA of a tree will trigger a detailed targeted AIA/AMS and arboricultural impact/ mitigation of the works explored. Scenario 9 will be amended in the AMS during detailed design. This amend will be to remove scenario 9 and replace it with a scenario where the need for foundations within the RPA of a tree will trigger a detailed targeted AIA/AMS and arboricultural impact/ mitigation of the works explored. Noted

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		Some of the Tree Protection Protocol found at Appendix C of the report requires amending and supplementing with additional information. Its acknowledged, the scale of this project is very large, and whilst the report includes a comprehensive protocol on tree protection measures, I consider that the information must be more site specific. For example, individual tree protection plans must be provided for all the sites. So, it is clear to the construction team, where exactly tree protection barriers, ground protection, utility routes etc is to be located. This is also a requirement as set out at Table B.1 of BS 5837:2012 and is standard practice for protecting trees during construction works. Tree Protection Protocol Scenario 6 is not acceptable. Using machinery to excavate within RPAs is likely to lead to excessive and adverse arboricultural impacts, contrary to section 7.2.1 of BS 5837:2012 which states 'To avoid damage to tree roots, existing ground levels should be retained within the RPA. Intrusion into soil (other than for piling) within the RPA is generally not acceptable, and topsoil within it should be retained in situ. However, limited manual excavation within the RPA might be acceptable, subject to justification. Such excavation should be undertaken carefully, using hand-held tools and preferably by compressed air soil displacement'. NJUG Volume 4 also provides guidance for installing utilities within proximity to trees. Similarly, Tree Protection Protocol Scenario 9 is not acceptable. Strip foundations within the RPA of trees can lead to extensive root loss and should be avoided. Machinery for excavating in RPAs should also be avoided. Specific Policies within the Tree Policy for Oxfordshire that would be applicable where impacts are proposed to Oxfordshire County Council trees, including highway trees, are shown below and are available on the following link: Tree policy for Oxfordshire Oxfordshire County Council Policy 11: The County Council will retain and maintain existing, healthy OCC trees and removal will only be considered for the following reason(s): • Dead, dying and / or dangerous • Proven to be causing significant structural damage	A CAVAT assessment of any public OCC trees will be carried out, on any trees requiring removal and suitable mitigation planting proposed.

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		- Considered by the Tree Service to be an inappropriate species for the location. Or: When removal is required as part of an agreed tree management programme. Policy 14: The County Council will seek compensation from any organisation or individual requesting removal of any public tree(s) related to an approved planning application that are the responsibility of the County Council. Compensation will be determined as calculated by Capital Asset Valuation of Amenity Trees (CAVAT). Policy 16: All organisations, companies or operatives must be able to demonstrate adherence to national guidelines and standards related to the protection and retention of trees listed in the reference and supporting documents section of this policy when working on land owned by the County Council; under the responsibility of the County Council; or within the Public Highway of Oxfordshire. When working near to or under trees, this must be referenced in their relevant method statements. Reference & Supporting Documents - BS 3998:2010 – Tree Work: Recommendations (or as revised) - BS 5837:2012 – Trees in relation to design, demolition and construction (or as revised) - BS 8545:2014 – Trees from nursery to establishment in the landscape (or as revised) - Oxfordshire Street Design Guide - Application of Tree Policy Guidance (or as revised) - Manual for Streets - Highways Act (or as revised) - Common sense risk management of trees (FCMS024) - Roots and Routes: Guidelines on Highways Works and Trees - Joint Mitigation Protocol - National Planning Policy Framework (NPPF) - National House Building Councils Standards - Chapter 4.2 (or as revised) - NJUG Publication Volume 4: Issue 2 (or as revised) - National Tree Safety Group (NTSG) - Risk Limitation Strategy	

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		- Forestry Commission - Operations Note 051 - Capital Asset Valuation of Amenity Trees (CAVAT) - Oxfordshire Together (OxTog) - Urban tree selection may be aided by Trees and Design Action Group (TDAG) publication - The relevant district local plan policies are shown below: - Vale of White Horse Local Plan 2031 Part 1, Core Policy 44: Landscape - West Oxfordshire Local Plan 2031 POLICY EH2 - The Cherwell Local Plan 2011-2031 Policy ESD 10, Policy ESD 13 and Policy ESD 17."	
38. Construction period and methods			
26	Batteries	Battery housing buildings that will store the energy (not even considered in the initial plan). These are going to take up considerable additional space to the panels itself. Concern for leakage and danger of the batteries themselves (another danger to consider that has to be part of the original plan for the long term not tacked on and bypassed - yet agreed, as they are necessary).	The Project does not include BESS; instead, energy generated will be dispatched to the grid and managed by existing off-site storage facilities, including the EDF 50 MW BESS at Cowley substation (Section 5.8.1, Chapter 5: Alternatives Considered [APP-42]). This approach reflects existing National Grid infrastructure and operational flexibility.
218, 624	Maintenance	Maintenance and down time for repairs, heavy vehicles, wildlife and nightlife disruptions to both the countryside and nearby residents are further concerns that cannot be mitigated given the scale of this proposal and its proximity to our homes.	The outline Operational Management Plan, [APP-234] at section 2 details the maintenance regime for the Solar Farm during the operational period of the project.
882	Fencing/Security	One out of many issues which needs to be considered in the Examination is the question of so-called "security fencing". PVDP asserts that the site will be protected by fencing often known as "deer fencing", otherwise known as "livestock fencing". Usually about 2.0 to 2.2 metres high, it is of an open wire mesh design, and it is claimed that it will not obscure views. This style / type of fencing is not "security fencing". The site will be subject to significant security risks, and the deer fencing will be easy to cut through, and the term 'security fencing' relates more properly to palisade fencing which will be harder to break through.	The outline Operational Management Plan, [APP-234] at section 2.8, identifies the security arrangements for the project during the operational period. The boundaries of the site will be secured both by fencing and by the provision of CCTV equipment. The Project will use agricultural-style deer fencing, 1.8 to 2.1 metres high, to secure key infrastructure including solar PV modules, PCS, substations, and electrical compounds (Chapter 6: Project Description, section 6.4.38 [APP-043]). The fencing is described as visually permeable and commonly used in rural settings as a means of enclosing and protecting solar farms, whilst helping to minimise visual obstruction. CCTV systems will be installed on steel or wooden poles at the substations, 3.0 to 4.0 metres high, positioned 1 to 2 metres inside the fenced boundary. The cameras will include infrared capability and emergency lighting, with no permanent external lighting. No. of CCTV cameras – 14 (two on each of the 6 no. Secondary Project Substations, and two on the Main Project Substation). (Table 6.4 and section 6.4.38 [APP-043]).
86, 169, 292, 730, 748	Piles	There are vagaries around the number of piles and their design. This is a proposal for a major infrastructure project and yet, it is so poorly planned that the applicant cannot state the total number of piles between 780 000 and more than double that number and, they cannot give a reasonably accurate estimate of the depth to which	Chapter 6 of the ES [APP-043] provides details of the Project Description including the design of piles, their depth and possible numbers (paragraph 6.4.10 and Table 6.2). The variation in the number of piles is as a result of the potential for the module mounting structure to either have one or two legs at each end, as stated at paragraph 6.4.10, but for 'worst case scenario' purposes two legs at each end has been assessed.

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		these piles would be driven. They don't even state the dimensions of the piles. All this information is essential to decision making, particularly bearing in potential impact on soil health, compaction and composition. How much damage would be done by these piles? There will also be unacceptable impacts from noise, vibration and air pollution due to piling.	CoCP Annex C, Outline Soil Management Plan [APP-232 & 233], provides details of the Soil Management Measures for elements of the Project within paragraph 9.6.9-12, including the mitigation of the installation of the piles upon the ground conditions. The outline Code of Construction Practice [APP-232 & 233] section 1.10 also contains details of environmental management measures, including noise and vibration from pile installation, and air quality management during construction.
30, 114, 172, 184, 236	Noise	To build such a huge solar farm will create a significant amount of noise. There will be lengthy construction impacts including cable trenching, pile driving and traffic. Beyond construction, what measures will be in place to prevent any noise pollution from the development.	A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213]. This assessment has identified that the development will not cause any significant adverse effects on noise sensitive receptors. This assessment includes consideration of noise from construction vehicles. During the construction and decommissioning phases, noise and vibration will be controlled and limited by the Outline Code of Construction Practice [APP-232 & 233] (CoCP) and the Outline Decommissioning Plan [APP-236] respectively. This code of practice will ensure that effects from construction activities are appropriately managed. The CoCP includes construction phase noise limits, and construction times. Noise from the operational phase will be controlled and limited by the outline Operational Management Plan [APP-234] (oOMP). This includes noise mitigation measures which will ensure that no resident experiences a significant adverse effect. Mitigation measures include noise limits for operational noise sources, as well as the location of operational phase noise sources to reduce the potential noise impact on receptors.
169, 423, 860	Construction Process	The construction process itself would impact on the surrounding area for a long time; Construction noise and pollution, lorries bringing huge quantities of materials, noise of machinery, lack of ease of access to surrounding roads for residents.	Paragraph 1.2.2 of the outline CoCP [APP-232] sets out a standards and measures that will be implemented during the construction process to ensure a consistent and effective approach to managing potential environmental impacts in order to avoid or minimise nuisances to communities and to safeguard the environment. The oCoCP includes strategies, control measures and monitoring procedures for managing the potential environmental impacts and limiting disturbance from construction activities as far as reasonably practicable. The oCoCP [APP-232 & 233] Annex A Outline Construction Traffic Management Plan, at paragraph 1.1.7, states that the purpose of the OCTMP is to set out how the numbers and routeing of Heavy Goods Vehicles (HGVs) will be managed during the construction phase, how the movement of construction worker traffic will be managed during the construction phase, details of measures to manage the safe passage of HGV traffic via the local highway network and details of localised road improvements if and where these may be necessary to facilitate safe use of the existing local highway network.
343	Working Hours	Botley West construction is likely to be 12 hours a day, 6 days a week.	The Applicant confirms that the Outline Code of Construction Practice [APP-232 & 233] (oCoC) at Section 1.8 General Requirements, paragraph 1.8.2, states that core working hours for the construction phases of the Project,

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			and secured through the DCO, are proposed to be 07:00 to 19:00 Monday to Saturday.
241, 502	Environmental hazard / Redundant Panels	Redundant panels present an environmental hazard. Solar panels are cheap and quick to produce, but have a short lifespan, and are not yet readily recyclable.	As detailed in the outline Operational Management Plan [APP-234] (oOPM) section 3 Mitigation and Management Table 3.1 Operational Mitigation and Management Measures, Waste, Reduction in the landfill void capacity states that PV panels will be recovered by the WEEE Regulations 2013. This will be done in accordance with 'Best Available Treatment, Recovery and Recycling Techniques and will be undertaken by an authorised reprocessor.
278, 384	Topsoil	Spraying Glyphosate and so on beneath or beside the panels will kill wildlife, pollute the water drained off (which is channelled by the panels), and disrupts soil biology. Clearing and utilization of a large agricultural land mass can affect flora & fauna, rainfall, and drainage system of the concerned area. Moreover, chemical spills during maintenance activities from these facilities can contaminate groundwater and water reservoir. Topsoil is removed and cleaning materials can contaminate the soil.	Paragraph 1.10.46 of the outline Code of Construction Practice (Annex C) [APP-232] states that a Soil Management Plan will be implemented to ensure the conservation of soil resources; avoidance of damage to soil structures; maintenance of soil drainage; and the reinstatement, where required, of soil profiles as near as possible to their former condition. The Soil Management Plan will also maintain the quality of agricultural land temporarily affected by disturbance during construction. Panels are only proposed to be cleaned by water, with no chemicals or solvents.
208, 613	Needs Case	PVDP claims that the requirement for Very Special Circumstances has been met by the priority need for accelerated renewable energy development to reach the Government Target of 70GW by the 2035 deadline set out in the document Powering Up Britain Energy Security Plan, 2023. This is ridiculous, urgency does not make this a good choice for energy production. The land needs to be shown to be a good choice, in fact the best choice to truly qualify. No comparisons to other areas have been provided, not alternative plans have been presented. They haven't really made a compelling argument for Very Special Circumstances at all. Gas is also needed on the grid to balance unpredictable weather dependent technology, thus feeding a codependent relationship between the two.	As detailed in the Planning Supporting Statement, [APP-225] , paragraph 1.2.1, the UK government has legislated to commit the country to achieving net carbon emissions by 2050 and to de-carbonise electricity by 2035. Botley West is part of the solution, many more similar schemes are urgently needed.
589, 780	Weather Damage/Damaged Panels	The incidence of extreme weather is forecast to increase and instances such as the 2021 tornado, which caused much damage locally underline this view. Storm Damage and risk of flying splinters Storm Darragh in November 2024 severely damaged the Porth Wen solar farm in Anglesey. Hundreds of solar panels at the 190 acre solar farm were ripped from their foundation supports, blown to pieces and left strewn about fields. The panels were installed only 2 years ago. The frequency of such storms will only increase with the continuing impacts of climate change. There is no indication how the developer intends to prevent this happening to their panels, where the area covered	As detailed in the ES Chapter Document ref EN010147/APP/7.6.2 the oOPM section 2 Operational Environmental Management, section 2.2.1 states that maintenance and servicing would include inspection, removal, reconstruction, refurbishment, or replacement of faulty or broken equipment, to ensure the continued effective operation of the Project. Extreme weather events such as storms with high winds are also possible in the existing and future baseline and the Project's design will need to account for this. Manufacturing standards for PV modules (listed above) require consideration for extensive weathering (such as from hailstorms) and extreme thermal fluctuations. As such, extreme weather events are not considered to cause significant environmental effects to the Project. The increased likelihood of extreme weather resulting from climate change is part of the driving force behind the need to de-carbonise UK energy supply, and meet UK and Global commitments.

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		by panels will be approximately 10 times that of Porth Wen.	
1003	Unfinished Project	Scale and Construction Risk: What are the arrangements to ensure the development is completed after construction begins? What if the main contractor cannot complete construction? How does local government mitigate the risk of an unfinished project stretching for 11 miles across three local authority districts?	The draft DCO [AS-009] includes a requirement in Schedule 2 that prevents the authorised development from commencing until a code of construction practice (CoCP) has been submitted to and approved by the relevant planning authority. That plan must be substantially in accordance with the outline CoCP Requirement [APP-232] and [APP-233] and “must be implemented as approved”. This secures the delivery of the construction phase of the project, in accordance with measures that will have been approved by the relevant local planning authority. Further, from a practical perspective, it is in the Applicant’s commercial interests to complete the construction phase of the Project, to ensure that the solar farm becomes operational and starts generating electricity to the Grid.
39, 145, 252, 257, 271, 325, 345, 368, 380, 386, 394, 467, 482, 499, 512, 528, 573, 579, 580, 595, 610, 616, 637, 665, 686, 702, 736, 745, 747, 755, 785, 809, 833, 840, 858, 868, 965, 959, 1040, 1059, 1105	Traffic Disruption	A number of the RRs raise concerns about the overall impacts of construction traffic, including; routeing, highway safety, congestion and narrowness of highways, disruption to local traffic movements, cumulative relationship with other developments, and the noise and emissions associated with the construction traffic being generated.	As detailed in the CoCP Annex A, Outline Construction Traffic Management Plan, [APP-232 & 233] , paragraph 1.1.7 states The purpose of the OCTMP is to set out how the numbers and routeing of Heavy Goods Vehicles (HGVs) will be managed during the construction phase, how the movement of construction worker traffic will be managed during the construction phase, details of measures to manage the safe passage of HGV traffic via the local highway network and details of localised road improvements if and where these may be necessary to facilitate safe use of the existing local highway network. Paragraph 1.1.8 states A detailed Construction Traffic Management Plan(s) (CTMP)(s), will be prepared strictly in accordance with this OCTMP and in consultation with Oxfordshire County Council (OCC) as the Local Highway Authority and National Highways as the highway authority for the strategic road network. Although one detailed CTMP is envisaged, should NGET wish to adopt their own separate detailed CTMP specific to the construction of their substation that forms part of the Project (as set out in Volume 1, Chapter 6: Project Description of the ES), it would be prepared separately but remain strictly in accordance with this OCTMP.
39. Funding and PPA			
010, 013, 023, 044, 092, 123, 202, 208, 212, 221, 255, 268, 311, 332, 334, 346, 384, 404, 481, 571, 586, 606, 627, 644, 703, 711, 786, 810, 811, 830, 860, 890, 901, 912, 969, 995, 1023, 1075	Financial Transparency, Ownership and Disclosure	Several representations express concern that the funding statement is lacking transparency, information on the project ownership and the source of funding of the project.	As indicated in the Funding Statement [APP-022] , the ownership structure of the Applicant is as follows: 50% of the shares are held by Lockend Services Limited (a UK entity, company number 12194884), which is fully owned by Peter Gerstmann, a UK resident and German citizen. 50% of the shares are held by Yulia Lezhen, a Cyprus resident and citizen. Photovolt Development Partners GmbH (German commercial register number HRB 120228 B), is fully owned by Cransseta Investment Ltd (Cyprus company registration number HE286460), which is fully owned by Yulia Lezhen (the spelling of the name follows the transcription from Republic of Cyprus records, which are maintained in Greek characters). As section 4.8 of that Funding Statement supports, Peter Gerstmann and Yulia Lezhen have so far financed development activities from proprietary funds that were obtained from previous activities, mostly in Japan. To date approximately £11 million has been provided to the Applicant on a shareholder loan basis for developing the Project. They will also be funding the significant costs in taking the Application through the full DCO application process to determination. Upon development consent, Peter Gerstmann and Yulia Lezhen will obtain additional funding from lenders and

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			other investors to finance construction of the Project. Such discussions are currently being held. In the past Peter Gerstmann and Yulia Lezhen have been able to obtain financing for all previous projects and are confident that, subject to a positive DCO application outcome, funding will be provided, given the attractiveness of UK renewable projects for a large number of institutional investors. Further information on the Applicant's corporate structure is in Appendix 1 to the Funding Statement, with section 6 of that statement providing specific detail in relation to project funding [EN010147/APP/4.2]. The beneficial ownership for companies is publicly available in the People with Significant Control register. It can be found under https://find-and-update.company-information.service.gov.uk/company/12602740/filing-history and for Photovolt Development Partners under https://www.transparenzregister.de/ As for funds earned in Japan, it is referred to project Ukujima, which is widely known in Japan and was sold to Kyocera, Kyudenko and others and is thus a source of the applicant's funds.
010, 053, 086, 092, 100, 101, 217, 303, 443, 452, 585, 593, 641, 672, 674, 737, 854, 861	Foreign ownership, ultimate beneficiaries and control	Concerns are expressed on the ownership of the Applicant and the ultimate beneficiaries who are controlling and are behind it.	The ownership structure of the Applicant is as follows: 50% of the shares are held by Lockend Services Limited (a UK entity, company number 12194884), which is fully owned by Peter Gerstmann, a UK resident and German citizen. 50% of the shares are held by Yulia Lezhen, a Cyprus resident and citizen. Photovolt Development Partners GmbH (German commercial register number HRB 120228 B), is fully owned by Cransseta Ivestment Ltd (Cyprus company registration number HE286460), which is fully owned by Yulia Lezhen (the spelling of the name follows the transcription from Republic of Cyprus records, which are maintained in Greek characters). Further information on the Applicant's corporate structure is in Appendix 1 to this Funding Statement [EN010147/APP/4.2]. The beneficial ownership for companies is publicly available in the People with Significant Control register. It can be found under https://find-and-update.company-information.service.gov.uk/company/12602740/filing-history. For Photovolt Development Partners under https://www.transparenzregister.de/
0023, 0084, 0092, 0325, 0335, 0479, 0677, 0718	Developer capability and past performance	It is asked for evidence that the developer has the capability, experience and capacity to deliver one of the biggest solar farm projects in Europe.	PVDP was established in 2009 and focuses on developing utility-scale solar photovoltaic projects, with expertise across all phases of project development, including site acquisition, engineering, public consultation, financing, construction management, and commissioning. The company has a track record of developing 980Wp across 20 solar projects worldwide. The Founders Peter Gerstmann and Yulia Lezhen have been involved in solar developments since 2003. Peter Gerstmann brings 30 years' experience in the energy industry. Yulia Lezhen is an entrepreneur with 13 years' experience in the energy industry. Furthermore, the PVDP team comprises a number of highly experienced professionals with a proven track record of successfully developing and constructing utility scale projects. The capability and past performance of Photovolt are exemplified in Japan by the well-known 480 MW Ukujima solar farm, which PVDP developed and sold to Kyocera, Kyudenko, and others. Their track record is also relevant

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			for the following two projects, which can be found independently on the Internet; - Onikobe project (183MWp) in Miyagi Prefecture; and - Kawasaki Solar Park project (56MWp) in Shibata, Miyagi
0135, 0554, 0579	Decommissioning obligations and guarantees	The ability of the Applicant to fully fund decommissioning of the site and restoration of the countryside/farmland at the end of the working life of the solar installation is questioned.	The application is supported by an outline Operational Management Plan [APP-234]² and an outline Decommissioning Plan [APP-236]. The Applicant has the means to acquire the required rights and build the Project as set out in the Funding Statement [APP-022]. With respect to financing of the decommissioning, if made, the Development Consent Order [AS-009] would require the decommissioning of the Project in accordance with a Decommissioning Plan (DP) (requirement 14, Schedule 2). An outline DP [APP-236] has been prepared as part of the DCO application. This provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement to prepare and approve the DP and for it to be substantially in accordance with the oDEMP, and for the approved DP to be implemented. The requirement will be enforceable against anyone who holds the benefit of the Order at the time that the Project is decommissioned and failure to comply with the requirement would be a criminal offence pursuant to section 161 of the Planning Act 2008. Further, the elements of the installed solar farm represent a valuable asset for the Applicant, so it would be in its interests financially, to decommission the site in order to recycle or sell those components. If the undertaker of the Order went into liquidation, its assets would be sold off to fund the decommissioning under the legal requirement. The Applicant made more detailed representations on the point at Issue Specific Hearing 1 (on the DCO and Strategic Matters), a summary of which can be found in the Applicant’s written summary of oral submissions that has been submitted at Deadline 1. For the avoidance of any doubt, Photovolt strictly adheres to the UK Modern Slavery Act 2015.
0292	Power Purchase Agreements (PPAs)	It is asked whether energy security be achieved by a totally private sector venture and able to be sold on the open market?	In the field of renewable energy, not state-run enterprises but private sector ventures have achieved major progress. Only during the initial introduction period, renewable energy policies had provided for feed-in tariffs, i.e. market interventions by the Government. Energy security and the sale of renewable energy in the private sector is meanwhile mostly accomplished by short- and long-term Power Purchase Agreements negotiated and agreed upon in open markets.
208, 362, 366, 583, 679, 721, 803, 886, 890, 1092	Economic Viability and Value for Money	The Botley West Solar Project has been the subject of detailed examination, with respondents distinguishing between general support for renewable energy initiatives and specific considerations regarding this particular development. In the context of broader efforts to address climate change and reduce dependence on fossil fuels, various aspects of the project's implementation have been noted for review. These include:	The Botley West Solar Farm is a commercially financed infrastructure project with no reliance on public subsidy. As confirmed in the Funding Statement [APP 022], the Applicant, SolarFive Ltd, is supported by Photovolt Development Partners GmbH and has funded development activity to date via proprietary resources, with future construction anticipated to be financed through a combination of equity and debt. All financial risk is borne by the Applicant, and a Final Investment Decision will be made following the granting of a Development Consent Order (Sections 4.2–4.8, 6.1–6.5, [APP 022]).

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
		• The projected long-term efficiency of the proposed solar technology • The potential environmental implications • The level of local community engagement during the planning process. The project's commercial structure has also been highlighted in relation to its alignment with environmental sustainability and public interest objectives. Ongoing assessment may assist in determining whether the project is positioned to achieve long-term, responsible outcomes while maintaining the character of the surrounding area.	As described in Chapter 6: Project Description [APP 043], the development will deliver up to 840 MWe (AC output), with a total installed capacity of approximately 936,000 kVA—enough to supply electricity to approximately 330,000 homes (Section 6.1.1, [APP 043]). The scheme will involve the installation of between 1.8 and 2.2 million utility-grade PV modules with a combined peak output of up to 1,375 MWp, mounted on fixed, non-rotating structures. These panels will be constructed to international durability and performance standards (IEC TS 63126:2020, IEC 62548, and IEC 61215-1:2021) (Sections 6.4.7–6.4.9; Table 6.3, [APP 043]). The long-term efficiency of the system is supported by both the selection of certified technology and the ability to replace individual modules as needed over time to maintain performance. The layout and installation are designed to optimise exposure and minimise shading, with panels positioned between 0.8 m and 2.2 m in height and angled between 12–18 degrees (Table 6.3, [APP 043]), ensuring consistent and stable output across the operational lifespan. The scheme is proposed for a temporary duration of 42 years, comprising approximately 24 months of construction, 37.5 years of operation, and 24 months for decommissioning. Upon completion of the operational phase, all above-ground infrastructure will be removed, and land will be returned to agricultural use, in accordance with the Outline Decommissioning and Restoration Plan (Sections 6.1.5–6.1.8; 6.5.1–6.5.3 [APP 043]). In terms of environmental performance, the development occupies approximately 1,418 ha, of which around 839 ha is used for panel installation. The remainder will be retained for compatible agricultural use, including conservation grazing, and up to 30 ha will be allocated for community food-growing areas (Section 6.1.4, [APP 043]). The scheme is expected to deliver a Habitat Biodiversity Net Gain of approximately 70%, as set out in the Outline Landscape and Ecology Management Plan [APP 235]. From a climate perspective, Chapter 14: Climate Change [APP 051] concludes that the project’s lifecycle greenhouse gas emissions are significantly outweighed by the emissions it will displace through clean electricity generation. The assessment confirms that the project aligns with the energy and carbon policy frameworks in EN-1 and EN-3 and will make a material contribution to national decarbonisation objectives (Sections 14.7.3–14.7.6; 14.8.2). The Applicant undertook a multi-stage consultation process, as detailed in the Consultation Report [APP 024], including an initial non-statutory consultation, a 10-week statutory consultation, and targeted consultations on boundary changes. The Section 47 statutory consultation reached over 22,000 properties and included nine public exhibitions and online webinars (Sections 4.2.1–4.2.15; 7.3–7.6, [APP 024]). The Statement of Community Consultation, prepared with input from local authorities, shaped the approach to engagement, which informed project refinements such as visual mitigation, biodiversity, and traffic measures (Sections 6.2–6.4, [APP 024]).
40. Grid Connection			
384, 428, 435, 532, 579, 683, 711, 786, 857, 888, 965, 1024	Grid Connection	Concerns were raised about the project’s ability to connect to the National Grid and about the location of the 400kV Grid Supply Point.	The Grid Connection Statement [APP-3.5] sets out in detail the Applicant’s relationship with National Grid and the contractual arrangements for connecting the solar farm to the National Electricity Transmission System. The Statement describes the two likely locations for the National Grid substation and describes what is required to facilitate the connection

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
			between the Project and the National Grid. The Applicant signed a Bilateral Connection Agreement A/NGET/SOLA/21/DENM-EN(0) in June 2021 and has been working closely with National Grid Electricity Transmission (NGET) over the last two years to assist in the delivery of the new National Grid Substation.
41. Waste and Resources			
18, 26, 30, 143, 190, 252, 516, 538, 562, 567, 613, 616, 702, 711, 812, 813, 908, 912, 991, 1009, 1077, 1079	Management of damaged or end of life photovoltaic panels	Respondents were concerned that there is no mechanism to recycle photovoltaic panels and at the end of the Project the panels would be landfilled. This was a concern due to the number of waste photovoltaic panels that would be generated from this and other solar farms, and the toxic chemicals that would be released into the environment.	Damaged photovoltaic panels that are replaced during the operations phase or during the decommissioning phase will be managed in accordance with the Outline Operational Management Plan [APP-234] and the Outline Decommissioning Plan [APP-236] respectively. Within these documents the Applicant confirms that Waste Electrical and Electronic Equipment (WEEE) including photovoltaic panels and from supporting electrical infrastructure (e.g. power converter stations) will be recovered and recycled by an authorised reprocessor. The solar panels proposed for Botley West are durable, solid-state units with no liquids or hazardous substances that could leak during normal use or extreme weather. The materials used (silicon, EVA film, glass, backing film, aluminium frame) are stable and sealed. The cells are embedded in polymer films (e.g. EVA) and protected by front glass and back glass - this prevents material leakage. The Applicant confirms that the Operational Management Plan will be agreed with the relevant planning authority in consultation with the planning waste authority as secured in Requirement 12 of the draft DCO, including the assessment and management of any risk associated with damage or leakage. Prior to decommissioning, a Decommissioning Plan will be agreed with the relevant planning authority. The Decommissioning Plan will substantially be in accordance with the Outline Decommissioning Plan [APP-236] as secured in Requirement 14 of the draft DCO [AS-019].
384	Additional timber and iron resources	Respondents raised concerns that timber or iron will be required for the fence posts	The Applicant confirms that the list of resources within Volume 3, Chapter 18: Waste and Resources [APP-055] focuses on the key resources and notes that the list of resources is not exhaustive. The Applicant also confirms that a detailed Site Resources and Waste Management Plan (SRWMP) will be prepared as part of the detailed Code of Construction Practice (as secured in Requirement 12 of the draft DCO [AS-009]). The SRWMP will set out how the consumption of key resources will be minimised and managed during the construction process.
185	Use of water for cleaning photovoltaic panels	A concern was raised about the volume of water required for cleaning the photovoltaic panels during operations and maintenance, in particular the water supply had not been included in the DCO application and the environmental impacts had not been considered.	The Applicant confirms that the photovoltaic panels will be naturally cleaned by the rain and no separate water supply is required for cleaning.
RR-0793 Oxfordshire County Council	Mineral Resource	The Applicant's MRA calculates the lost mineral to be 3.58 million cubic metres which at a conversion rate of 1.5 tonnes per cubic metre would be 6.87 million tonnes. The latest Local Aggregate Assessment has an Annual Provision Rate (APR) of 0.986 million tonnes. This means that the mineral lost would be equivalent to 6.97 years of supply for Oxfordshire which would be almost equivalent to a 7-year landbank requirement set out in the NPPF.	The mineral referred to by OCC is an identified safeguarded resource of sharp sand and gravel, but not an allocated reserve. The effects of the proposed development upon the resource is provided in the Applicant's Mineral Resource Assessment (MRA), Appendix 11.14 [APP-195], and areas of potentially viable sand and gravels are shown in Figure 10, relative to the Order Limits.

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
		The amount of sand and gravel that would be prevented from being worked therefore considered significant, and would come at a time when central government are prioritising house building and growth which will need the adequate supply of sand and gravel to meet demand. Oxfordshire has now stopped work on the Site Allocations Document and commenced work on a new plan to incorporate both the core policies and site allocations. Nevertheless, policy M5 of the Core Strategy states that prior to the adoption of the Site Allocations Document, permission will be granted if the application is, among other things, consistent with the locational strategy in policy M3 of the Core Strategy. The Core Strategy remains the current Development Plan document and therefore policy M5 still applies. This does not mean that there is no need for mineral extraction in Northern Oxfordshire. The Applicant states that the planning permission would be temporary, and would be removed at the end of forty years. It would be the case that the development would be in place throughout the life of the next Minerals and Waste Local Plan, and most likely for the one following that. Also, it should be noted that paragraph 168(c) of the NPPF states that when determining planning applications for end of life extensions to existing renewable sites, local planning authorities should give significant weight to the benefits of utilising an established site. This suggests that once the precedent of using the site for a solar farm, there would be planning policy support for continuing to do so once the temporary permission has expired. This principle could be applied to Botley Solar Farm in the future, and this would further prevent or hinder the future working of the mineral. Given that the mineral being prevented or hindered from being worked and potentially sterilised if the solar farm is never removed, would be almost the equivalent of our required seven year land-bank, and that the mineral would be unable to be worked a minimum of 40 years, this would be a major negative outcome from a Mineral Planning Authority perspective. The Applicant has reiterated the value of the renewable energy, but they have assessed the value of the mineral as moderate to negligible, and therefore have not addressed the need to overcome a major effect on the mineral resource. Consequently, the case for building the part of the solar farm that would prevent or otherwise hinder	The MRA includes consideration of the need for the development against sterilisation (which will not be permanent), and the practicality of prior extraction. The total prior extraction of materials, and associated overburden, once buffer zones and the fragmented land parcels are factored in, has not been considered viable in the Applicant’s assessment.

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		future working and possibly sterilise the mineral resource has not been justified.	
RR-0793-053 Oxfordshire County Council	Waste & Resources	In respect of ES Chapter 18 – Waste and Resources [APP-055], the Minerals and Waste Planning Authority makes the following comments: The potential impacts as set out in table 18.23 (maximum design scenario considered for the assessment of potential impacts) only considers the reduction in landfill capacity; it does not consider alternatives to waste management methods further up the waste hierarchy. The mitigation measures in table 18.24 (mitigation measures to be adopted as part of the Project) states that the Outline Site Resources and Waste Management Plan includes targets to divert waste from landfill. This seems out of step with table 18.23. This section also states that an Operational Waste Management Plan will be agreed with the Waste Planning Authority prior to development commencing, but the disposal of the waste produced is fundamental to the planning decision and so this information should be provided prior to any consent being granted. The proposal does not include a proposal for a waste management facility, and so there are no waste policies to apply to the application, but the amount and type of waste that would be created by the development would require waste management in the future. This would be a large amount of additional waste that would need to be planned for in future Waste Local Plans. The waste impact of the site is therefore a major negative one.	The Applicant will develop the commitments made in the outline Operational Management Plan [APP-234] and the outline Decommissioning Plan [APP-236] regarding recycling at appropriate facilities, and requirements associated with the delivery of these plans will have to be approved by OCC as the Minerals and Waste Planning Authority.
42. Explicit Support			
26, 46, 51, 74, 81, 85, 88, 94, 104, 123, 131, 160, 163, 166, 167, 181, 186, 193, 195, 211, 211, 222, 261, 266, 320, 347, 362, 371, 373, 393, 422, 437, 450, 470, 507, 519, 524, 530, 540, 570, 598, 611, 650, 659, 666, 680, 682, 689, 740, 757, 772, 802, 804, 836, 909, 932, 987, 997, 1017, 1028, 1028, 1062, 1069, 1072	Many comments of support including in-principle support, support for the need for more renewables, and detailed comments encompassing support for the social, economic and environmental benefits arising from the project.	Comments include references to: support in-principle; recognition of urgent need; the objectors do not represent the views of the majority of residents; support for sustainability and community benefits; reduction in carbon emissions; enhance access to local food; increase in biodiversity by creating one of Oxfordshire's largest nature projects; increase attractiveness of the countryside; no one will see it unless they deliberately look for it; need for agricultural land to be rested; more projects of this type needed; any jobs lost would be replaced many times over; greater benefits with large size; roof to solar insufficient to meet need; good to remove agricultural traffic and replace by a more benign/natural use; current land has less biodiversity than what is proposed; large scale	The Applicant is reassured to note that some of the 'silent majority' have made explicit their support for the project in this location, at this scale, and to bring it forward without delay. All of the points made counter directly the points raised as concerns by those who object. These relevant representations recognise the urgent need and that this location is acceptable in planning and environmental terms and welcome the clear benefits the project will deliver.

Ref. No.	Sub issue	Comments from Relevant Representations	Response to Relevant Representation
		solar project must be in local areas such as Oxfordshire; solar farms have minimal environmental impact; benefit from improved access in footpaths and cycleways and improved connectivity; the benefits outweigh the costs; it's a win-win situation; we do not have time to wait for 'better' options which themselves will attract objections; increasing renewable energy will have a medium term beneficial impact on food security; Botley West has a confirmed grid connection – something that many other renewable projects can only dream of; proud to walk through and see fields of solar panels near my home, a tangible sign we are making real progress towards net zero – a chance for Oxfordshire to lead the way, setting an example for the rest of the UK; solar energy plans on this scale are the most efficient; project is of an appropriate scale to match the size of the threat that climate change presents; my house is close to the solar farm and have no concerns about claimed spoilt views; there is no other source of renewable energy that can be built, and therefore generate benefits, as fast as this scheme; be positive about our future and embrace this change; the country needs green energy and this location should contribute to the production.	



Botley West Solar Farm

Applicant Responses to Relevant Representations -
Cherwell District Council [RR-0164]

June 2025

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I. Applicants' Comments in response to the Relevant Representations submitted by Cherwell District Council [RR-0164]

Table I-1: Applicants' Comments on Relevant Representations

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
1. Planning Policy			
RR-0164-001	Local Policy	Local Policy Context Whilst not determinative under the Planning Act 2008, the Examining Authority can consider other important and relevant matters, including national and local planning policy. The local policies that CDC considers of relevance to this application are highlighted below and should be considered as important and relevant to the determination of the application. The Development Plan comprises the Adopted Cherwell Local Plan 2011-2031 (Part 1) (CLP), 'Saved' policies of the Adopted Cherwell Local Plan 1996 and the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need. Regulation 10A reviews of the Cherwell Local Plan 2011-2031 Part 1 took place in 2020 and 2023. In 2020, the Council undertook a 5 Year Review of the Local Plan and concluded that the majority of the policies were generally consistent with government policy and/or local circumstances. It did not indicate that the Local Plan policies needed updating. The Review was presented to and approved by the Council's Executive on 4 January 2021. Two material changes in circumstance since that approval prompted the 2023 Local Plan Review: - Termination of the Oxfordshire Joint Local Plan work programme; and - New evidence in the form of the Housing and Employment Needs Assessment (HENA) 2022 The Regulation 10A Review of Local Plan Policies (February 2023) showed that nearly all policies were generally consistent with government policy and/or local circumstances. It did not indicate that	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS.

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		the policies needed updating at this time, with the exception of Policy BSC1 District-Wide Housing Distribution. The Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review – Oxford's Unmet Housing Need was formally adopted as part of the statutory Development Plan in September 2020. The Partial Review provides the strategic planning framework and sets out strategic site allocations to provide Cherwell District's share of the unmet housing needs of Oxford to 2031. There are no 'made' Neighbourhood Plans within the site area covered by the Cherwell District. An area within the northern application site was designated in 2019 to allow Shipton-on-Cherwell and Thrupp Parish Council to produce a Neighbourhood Plan for their Parish but this has not been progressed at the current time.	
RR-0164-002	Principle of Development and Strategy	Strategy CDC has declared a climate emergency and is committed to tackling climate change. The Council accepts that there is a compelling need, as a matter of principle, to increase renewable energy generation and consumption to support the Government's national agenda to reach net zero carbon by 2050. 4 Therefore, the Council does not raise objection to the principle of large-scale solar photovoltaic generation developments within the District subject to: (i) the appropriate siting of such schemes, (ii) the provision of appropriate mitigation to deal with any significantly harmful impacts that would arise, and (iii) such mitigation being tailored specifically and sensitively to matters of location and related context. The acceptability of the proposal is intrinsically linked with the impacts of the development. The proposed scheme would represent a solar development on an unparalleled scale, particularly for this rural context. Whilst the proposed development would make a positive contribution to reducing carbon emissions over its proposed life span, there would undoubtedly be adverse effects that need to be balanced against the benefits. The strategy which underpins the adopted CLP is to focus the bulk of the proposed growth in and around Bicester and Banbury, to limit	The Applicant welcomes the in-principle support for the Project by CDC subject to the appropriate siting and location sensitive mitigation of any adverse impacts arising. In this regard the Applicant has engaged with all host authorities via the statutory consultation process and the use of a Planning Performance Agreement and consider they have listened to and responded to relevant concerns in relation to the Project. The Applicant has set out its reasoning for the sites' location and size and how they have developed the scheme over a number of years, responding in an appropriate way to planning and environmental constraints. The Applicant will continue to engage with the authority through the Examination process, and the SoCG's and, if granted, in the agreement to and discharge of the detail of the scheme via the Requirements.

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		growth in rural areas and direct it towards larger and more sustainable villages and to strictly control development in the open countryside. The application site lies outside of any allocation or settlement boundary and is therefore deemed to be open countryside for planning purposes. It is therefore in conflict with the spatial strategy which seeks to protect the countryside from development unless there is a robust justification to demonstrate why this should be set aside.	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS. The alleged conflict with the spatial strategy is inevitable as the plan follows a traditional planning approach to directing growth to existing settlements. Utility Scale Solar farms require large areas of open land to operate, with sufficient available land typically located in countryside locations. To that extent it is not uncommon for a project of this scale to not be contemplated by a spatial strategy and is likely to be in conflict with such spatial strategies unless approved under another policy. To the extent there is a local plan policy that could be applied to the Project, then it is Policy ESD5: Renewable Energy. This states that the Council supports renewable and low carbon energy provision wherever any adverse can be satisfactorily addressed. The Applicant considers Botley West substantially accords with this policy. The Applicant demonstrated how adverse effects have been avoided, or minimised and/or mitigated

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			to an acceptable level in accordance with national policy terms (NPS EN1,3 and 5].
RR-0164-003	Climate Change	Climate Change Policy ESD 1: Mitigating and Adapting to Climate Change seeks to mitigate the impact of climate change within the District and promotes the adoption of decentralised, renewable, and low carbon energy where appropriate	The Applicant considers the Project substantially accords with this policy as it will contribute significantly towards mitigating Climate change. The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS.
RR-0164-004	Renewable Energy	Renewable Energy Policy ESD 2: Energy Hierarchy and Allowable Solutions allows for 'Making use of renewable energy' in order to achieve reductions in carbon emissions. Policy ESD 5: Renewable Energy supports renewable and low carbon energy provision wherever any adverse impacts can be addressed satisfactorily. Potential adverse impacts listed in the policy are: • Landscape and biodiversity including designations, protected habitats and species, and Conservation Target Areas • Visual impacts on local landscapes • The historic environment including designated and non-designated assets and their settings	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS.

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		• The Green Belt, particularly visual impacts on openness • Aviation activities • Highways and access issues, and Residential amenity.	Policy ESD 2 is designed to address energy efficient and how it is used rather than dealing the generation of energy which is the focus of the Botley West Project. To that extent this policy only has limited relevance. As state above (RR-0164-002), the Applicant considers that its proposals accord with Policy ESD 5.
RR-0164-005	Flood Risk	Flood Risk Policy ESD 6: Sustainable Flood Risk Management seeks to manage and reduce flood risk in the District and ESD 7: Sustainable Drainage Systems (SuDS) requires all development to use SuDS.	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS. The Applicant considers that the Project has appropriately managed flood risk impacts in substantial accordance with these policies.

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RR-0164-006	Biodiversity	Biodiversity Policy ESD 10: Protection and Enhancement of Biodiversity and the Natural Environment. Of particular relevance to this application this policy seeks: net gains in biodiversity; to protect existing trees and increase the number of trees; the reuse of soil; and the provision of new and preservation of existing features of nature conservation value. Development that would result in significant and unavoidable harm which cannot be adequately mitigated or (as a last resort) compensated will not be permitted. Damage or loss will not be permitted unless the benefits clearly outweigh the harm.	In substantial accordance with this policy, the Applicant considers that the Project has appropriately avoided, minimised and mitigated adverse effects on biodiversity and the natural environment, with a comprehensive, ambitious enhancement and biodiversity net gain package (including 70% habitat BNG). The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS.
RR-0164-007	Landscape	Landscape Policy ESD 13: Local Landscape Protection and Enhancement. Development will be expected to respect and enhance the local landscape character, securing appropriate mitigation where damage to local landscape character cannot be avoided. Proposals will not be permitted where they: • Cause undue visual intrusion into the open countryside • Cause undue harm to important natural landscape features and topography • Be inconsistent with local character • Impact on areas judged to have a high level of tranquillity • Harm the setting of settlements, buildings, structures or other landmark features, or	The Applicant considers that the Project substantially accords with this policy with an embedded mitigation and enhancement package proposed to manage effects on the local landscape character. The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		Harm the historic value of the landscape.	national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS.
RR-0164-008	Green Belt	Green Belt Policy ESD 14: Oxford Green Belt. The Oxford Green Belt boundaries within Cherwell District will be maintained in order to: - Preserve the special character and landscape setting of Oxford - Check the growth of Oxford and prevent ribbon development and urban sprawl - Prevent the coalescence of settlements - Assist in safeguarding the countryside from encroachment - Assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Development proposals within the Green Belt will be assessed in accordance with government guidance contained in the NPPF and NPPG. Development within the Green Belt will only be permitted if it maintains the Green Belt's openness and does not conflict with the purposes of the Green Belt or harm its visual amenities.	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 7. The case for development within the Green Belt is made in Appendix 8. In addition, it should be noted that with the publication of latest Planning Practice Guidance (PPG) on Green Belts (27 February 2025), this alters the way in which some of the Green Belt tests should be applied. In particular, Green Belt purpose A, B and D, now clarifies that is towns NOT villages that should be considered when assessing impact upon Green Belts. This will affect the way in which Green Belt policy should be applied at local level in relation to the Applicants Project. The Applicants' assessment of it effect upon the Green Belt remains unaltered except in respect of Green Belt purpose B – to prevent neighbouring towns from merging into one another. Here the Applicant is of the view that conflict is less than previously assumed. In their analysis, the Applicant had identified that the narrowest point of the Green Belt which the Project affected, was between Bladon and Begbroke. Under the new guidance this analysis is largely redundant insofar as both these settlements are

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			'villages' and these are now effectively excluded from assessment in the latest guidance. The nearest 'towns' now affected by the Project are Woodstock to the north, Witney to the west, Oxford to the east and Abingdon to the south. Given the much more significant areas of openness between these towns and the Project, the threat of merging is diluted even further. Notwithstanding, Section 104 of the Planning Act 2008 requires the Secretary of State to have regard to the NPS and decide the application in accordance with the NPS. Importantly NPS EN-1, 4.2.16 and 4.2.17 makes clear that the Secretary of State will take as a starting point that CNP Infrastructure, such as Botley West, will meet any Green Belt VSC test.
RR-0164-009	Heritage	Heritage Policy ESD 15: The Character of the Built and Historic Environment. Amongst other things, developments should contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features, including skylines, valley floors, significant trees, historic boundaries, landmarks, features or views, in particular within designated landscapes, within the Cherwell Valley and within conservation areas and their setting. Proposals should sustain and enhance designated and non-designated heritage assets. Paragraph B.267 in the introductory text to this policy highlights the importance of taking "into account heritage assets located outside of the District such as Blenheim Place, a World Heritage Site".	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS.

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			The PSS sets out the statutory framework for determining applications seeking development consent. Section 104 of the Planning Act 2008 requires the Secretary of State to have regard to the NPS and in essence decide the application in accordance with the NPS. Notwithstanding, the Applicant considers that the Project is in substantial compliance with this policy.
RR-0164-010	Green Infrastructure	Green Infrastructure Policy ESD 17: Green Infrastructure. The GI network will be maintained and enhanced via a number of measures, including ensuring the Green Infrastructure network considerations are integral to the planning of new development.	A range of mitigation and enhancement measures have been incorporated into the Project to improve public access routes, including PRoWs and permissive paths, together with landscape enhancement to contribute to the green infrastructure network. The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS. The Applicant considers that its Project substantially accords with this policy.
RR-0164-011	Saved Policies	Saved Policies of the Cherwell Local Plan 1996	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context

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		Policy C15 – Prevention of the coalescence of settlements. Restriction of development on areas of open land between settlements to prevent their coalescence. Policy C25 - Development affecting the site or setting of a scheduled ancient monument. In considering proposals for development which would affect the site or setting of a scheduled ancient monument, other nationally important archaeological sites and monuments of special local importance, the council will have regard to the desirability of maintaining its overall historic character, including its protection, enhancement and preservation where appropriate Policy C33 - Protection of important gaps of undeveloped land. Retention of undeveloped gaps important in preserving character of settlements or maintaining settings of listed buildings or preserving views/features of recognised amenity/historical value.	applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS. The Applicant considers that its Project is substantially in accordance with these policies.
RR-0164-012	Emerging Local Plan	Emerging Local Plan CDC has prepared a proposed submission draft (Regulation 19) of the Cherwell Local Plan Review 2042 which is published and open for public consultation until 25 February 2025 under the transitional arrangements set out in paragraph 234(a) of the revised NPPF. Under the transitional arrangements set out in paragraph 235, the Cherwell Local Plan Review 2042 will be examined under the December 2023 version of the NPPF. The weight to be afforded to this plan is currently limited but this will increase as the plan progresses through the consultation and examination process. This plan is intended to replace the adopted Cherwell Local Plan 2015 and 'saved' policies in the Cherwell Local Plan (1996).	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES and are also weighed in the planning balance in the PSS.

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RR-0164-013	Considerations	Key Considerations CDC expect the following matters to be scrutinised in detail through the examination phase: • Compliance with relevant legislation. • Policy compliance including EN-1, EN-3 and EN-5, development plan policies and planning balance. • Green Belt and Very Special Circumstances. • Landscape and visual impacts, including lighting impacts, glint and glare, residential amenity and effects on public amenity and recreation. • Heritage impacts. • Loss of Best and Most Versatile (BMV) agricultural land, including any evidence of prioritisation of non-BMV land and whether/how residual impacts can be mitigated. • Ecology and biodiversity impacts, including evidencing Biodiversity Net Gain. • Alternatives. • Traffic and transport. • Noise impacts. • Hydrology and flood risk. • Coalescence. • Impacts on aviation activities. CDC provides initial comment in relation to the following important and relevant considerations.	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 7. Appendix 8 sets out the Green Belt case. The relevant adopted and emerging policies of the various local Development Plans are also considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS. The Applicant accepts that the application will need to be judged against the policies listed. Compliance with the national policy takes primacy over local policy in the decision making process.
RR-0164-029	Other	Other Matters Coalescence Saved Policy C15: 'Coalescence of settlements' seeks to resist development in areas of open land which are important in distinguishing them. CDC is concerned about the coalescence of Begbroke and Kidlington caused by the development of the field to the south of London-Oxford Airport and east of the A44 which would remove the last remaining, undeveloped gap between the two	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 8. The relevant adopted and emerging policies

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		settlements. As referenced in relation to Green Belt policies and the loss of BMV above (Agricultural Land Use), it is suggested that solar panels should be omitted from this field both for reasons of preserving the Green Belt and BMV and to prevent coalescence.	of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS. The Applicant notes the planning authorities concerns and is working with the Oxford Airport to reach a satisfactory position with respect to safety issues; this may involve removing solar arrays in the vicinity. The Applicant suggests this issue and those of coalescence are revisited once discussions with the Airport have been concluded.
RR-0164-033	Summary	Summary CDC looks forward to engaging positively in the examination of the Botley West Solar Farm project and will continue to work with the applicants to ensure the process is robust and efficient. A full response setting out the technical assessment of the application, including CDC's position on policy compliance and a planning balance assessing the schemes benefits and disbenefits against the relevant policy framework will be reported within the Local Impact Report (LIR) and Written Representation (WR). CDC recognises the benefits of the scheme in terms of meeting climate change targets at district, county and national levels and is cognisant of the presumption in favour of energy NSIPs as per paragraph 4.1.3 of Policy EN-1 Overarching National Policy Statement for Energy. However, CDC is also concerned that the majority of the development would conflict with the purposes of the Green Belt and is likely to result in, and be an agent for, very significant change in a rural part of Cherwell District. As such, the character and setting of the countryside and local settlements could be detrimentally and substantially altered.	The Applicant notes and welcomes this.

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2. Green Belt			
RR-0164-015	Cherwell District Council	Inappropriate Development in Oxford Green Belt Policy ESD 14: Oxford Green Belt of the CLP addresses development in the Oxford Green Belt and seeks to ensure the Green Belt boundaries are maintained in accordance with the NPPF. The NPPF states that development in the Green Belt is inappropriate unless it falls within a number of specified categories, which would not apply to the proposed development, and the main purpose of 'openness' would be preserved. Due to the size and nature of the development, the proposed solar farm would not comply with any such NPPF provisions and the proposal would therefore be deemed to be inappropriate development in the Oxford Green Belt. NPPF paragraph 153 explains that inappropriate development in the Green Belt is, by definition, harmful and carries substantial weight. Such development should not be approved except in very special circumstances. It continues that very special circumstances will only exist if the harm to the Green Belt by its inappropriateness, and any other harm, would be clearly outweighed by other considerations. The NPPF adds (paragraph 160) that, when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. As advised in the NPPF (paragraph 142) the essential characteristics of Green Belts are their openness and their permanence. The openness of the Green Belt has both a spatial and visual aspect. From a spatial perspective, the proposal would introduce a substantial amount of development into an open area. This includes the panels and transformer units, along with the associated development of access tracks and security fencing. The visual impacts of the	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [APP-225]. At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. That VSC approach and weight to be attached to relevant factors accords with the requirements of NPS EN-1 section 5.11 and, in particular, para 5.11.37. The overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test. Arguably, because of this policy, the Applicant need not have made a VSC case. However, for completeness the Applicant has submitted a VSC case should the ExA and SofS consider any other aspects of the VSC test are relevant, other than the Project being CNP infrastructure. In addition, it should be noted that with the publication of latest Planning Practice Guidance (PPG) on Green Belts (27 February 2025), this alters the way in which some of the Green Belt tests should be applied. In particular, Green Belt purpose A, B and D, now clarifies that is towns NOT villages that should be considered when assessing impact upon Green Belts. This will affect the way in which Green Belt policy and any Green Belt studies undertaken by the host authority should be applied at local level in relation to the Applicants Project.

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		development will be assessed in detail in the LIR, but the development will likely result in some loss of visual openness of the Green Belt and diminish the spatial openness of the Oxford Green Belt. Green Belts also serve five specific purposes. As outlined at paragraph 143 of the NPPF, these purposes are to check unrestricted sprawl of large built-up areas, prevent neighbouring towns merging, safeguard the countryside from encroachment, preserve the setting of historic towns and assist in urban regeneration (by encouraging the reuse of urban land). Any conflict with these purposes will also result in other harm to the Green Belt. CDC considers that the proposals conflict with the purpose of preventing the coalescence of settlements under Policy ESD 14 of the CLP. It is noted that the applicant has referred to the proximity of Begbroke and Bladon in paragraphs 8.4.10 to 8.4.16 of Appendix 8 to the Planning Supporting Statement which deals with the 'Very Special Circumstances Case' but has not considered the much smaller gap between Begbroke and Kidlington. The development of the last remaining green field on the corner of A44 and Langford Lane between Begbroke and Kidlington would result in coalescence of these two settlements in conflict with both Green Belt policies and saved Policy C15 of the CLP 1996. Below, CDC also sets out further concerns about the development of this area in terms of BMV. The Cherwell Green Belt Study: Additional Green Belt Site Assessments 2023, was produced in support of the emerging Cherwell Local Plan and includes a review of the Kidlington 1A policy area: Accommodating High Value Employment Needs at (A) Langford Lane /Oxford Technology Park/ LondonOxford Airport. This area lies immediately adjacent and to the east of the central application site where it straddles the A44 at Begbroke. Assessing the contribution of this area to Green Belt purposes it concludes that in the context of purpose b) preventing neighbouring towns merging; "Development in this parcel could result in coalescence between the inset industrial estate at the north-western edge of Kidlington and the inset village of	The Applicants' assessment of it effect upon the Green Belt remains unaltered except in respect of Green Belt purpose B – to prevent neighbouring towns from merging into one another. Here the Applicant is of the view that conflict is less than previously assumed. In their analysis, the Applicant had identified that the narrowest point of the Green Belt which the project affected, was between Bladon and Begbroke. Under the new guidance this analysis is largely redundant insofar as both these settlements are 'villages' and these are now effectively excluded from assessment in the latest guidance. The nearest 'towns' now affected by the Project are Woodstock to the north, Witney to the west, Oxford to the east and Abingdon to the south. Given the much more significant areas of openness between these towns and the Project, the threat of merging is diluted even further. Also, the Applicant would draw the authority's attention to their ongoing discussions with the Airport to reach a satisfactory position in respect of safety; this may involve an adjustment to the solar array layout which in turn may affect the issue of coalescence to which the authority refer. The Applicant suggest this issue is revisited once discussion with the Airport have been concluded. The issue of the consideration of alternatives is considered in detail in Chapter 5 of the ES [App-042]. In respect of whether there is a sequential test or consecutive approach when it comes to finding

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		Begbroke, and would also result in greater isolation of land to the west, east and south, which have limited connectivity to the wider Green Belt given the presence of Langford Lane and the A44 and the railway line.” The 2023 Cherwell Green Belt Study goes on to conclude that the release of this area (defined as GB3a and which adjoins the central application site) from the Green Belt “would result in the coalescence of two settlements and would weaken the remaining strips of Green Belt around it, within the area contained by the A44, Begbroke, Kidlington and Langford Lane.” The harm to the purposes of the Green Belt in developing this area is deemed to be high. This adds weight to CDC’s concern that the development of the field immediately adjacent and to the west of GB3a and east of the A44 would result in the coalescence of Begbroke and Kidlington in conflict with national and local Green Belt policies. CDC do not consider grey belt as defined in the NPPF applies to the central site. Despite harm to the Green Belt attracting substantial negative weight, it has been established that renewable energy projects and associated infrastructure are not prohibited outright in the Green Belt. It is a matter of balancing the benefits against any harm that would result from the development. As the main benefit in this case will be the renewable energy generated by the scheme, CDC consider that it is crucial to independently assess the robustness of the assertion that 840MW per annum (enough to power 330,000 homes) can be achieved. The amount of renewable energy that can be produced should be reflected in the weight that is applied to this key benefit. The application material confirms the applicant accepts there is conflict with the purposes of Green Belt and harm to openness, but considers these are limited, temporary and reversible. CDC disagrees. The proposal would affect a very large part of the Green Belt for a generation.	development sites in Green Belts, as some IP’s claim i.e. that one has to consider brownfield sites first before selecting Green Belt land, the Applicants position is that policy in this respect is a ‘<i>preference</i>’ not an absolute ‘<i>requirement</i>’. This position is explained below. Only in NPS EN-3 para. 2.10.29 and 2.10.31 does it make a reference to this matter. Para.2.10.29 states: “<i>While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land...</i>”. At para 2.10.31 of NPS EN-3, it notes the ‘<i>preference</i>’ for development to be on suitable brownfield...land”. In NPS policy terms therefore, the Applicant characterises policy as a <i>preference</i> in policy terms not a <i>requirement</i>, and even then only <i>where possible</i> and <i>where suitable</i>. To reinforce the point, in NPS EN-3, para 2.3.9, it states that as most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the <i>Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land).</i> Beyond the NPS policy above, the NPPF (para 148) talks about a sequential test but only when

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		There is also little detail currently provided of what alternative sites outside of the Green Belt have been considered. The applicants have provided some information about their reasons for choosing the current site in Chapter 5 – Alternatives Considered of the ES but this does not include a detailed account of why other sites were discounted. Bearing in mind the significant impacts upon the Green Belt, CDC would like to understand more about why the alternative sites were disregarded. CDC therefore remain unconvinced that very special circumstances can be demonstrated to outweigh the harm to the Green Belt and wish to explore the applicant's stated Very Special Circumstances (as listed in paragraph 8.4.57 of Appendix 8 of the Planning Supporting Statement – document 7.1) at the Examination.	considering a change in Green Belt boundaries or the release of Green Belt. The applicant is not seeking a change to nor a release from the Green Belt, and in the Applicants view therefore, para 148 does not apply. Notwithstanding the policy position on this matter, the Applicant, in its search for suitable sites, looked at previously developed and brownfield land for the Project as potential suitable sites. For example, the Applicant looked at land near to, and grid connection at, the former Didcot A power station, but that was controlled by RWE and neither the connection nor the land was available to the Applicant. Shortly after the Applicant's enquiry, both the land (part of) and connection was subsequently used by a recently consented, and now constructed, data centre.
3. Historic Environment			
0164	Cherwell District Council	In general, the Council agrees with the assessment in the Environmental Statement (ES) chapter 7 with regards to harm.	The Applicant acknowledges this comment from Cherwell District Council.
0164	Cherwell District Council	The northern part of the proposal area is located between Woodstock and the A4260 and sits within the wider landscape setting of Hampton Gay, Shipton on Cherwell, and Thrupp Conservation Areas. There are three Grade II listed structures and buildings on the west side on the edge of Shipton on Cherwell closest to the development site, these include: The Manor and attached outbuildings, Kitchen Garden Walls, and the Church of the Holy Cross. These haven't been specifically considered in the ES, possibly because they are outside of the 2km zone, however it is considered that the historic landscape and	The 2 km study area for the assessment of the likely impacts and effects of the Project arising from changes within the settings of heritage assets was established through consultation with relevant stakeholders, commencing with the Scoping stage of the Environmental Impact Assessment (EIA). As set out in paragraph 1.3.1 of ES Appendix 7.5: Settings Assessment [APP-142], designated heritage assets beyond 2 km were considered if they fell within the Zone of Theoretical Visibility (ZTV) established for the Project and had designed

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		therefore the wider setting of these heritage assets could potentially be affected.	views towards the Project Site development or a particular iconic status that could be affected by the proposed development. None of the Grade II listed buildings on the edge of Shipton on Cherwell which are mentioned in the Relevant Representation have designed views towards the Project Site or a particular iconic status that could be affected by the Project, hence they were not considered within the detailed assessment presented in ES Appendix 7.5: Settings Assessment [APP-142]. The Applicant agrees that the wider settings of the Grade II listed buildings on the edge of Shipton on Cherwell which are mentioned in the Relevant Representation could be affected by the Project, but at a distance of more than 2 km the contribution that the setting makes to the heritage significance of the listed buildings would be very limited and therefore the magnitude of impact and the level of effect would be no greater than negligible. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach to assessment is necessary.
0164	Cherwell District Council	As previously advised the development area appears to come up to the boundary of the Begbroke Conservation Area and surround it on two sides. The setting of this Conservation area will be altered and there is potential for some harm to the significance of the conservation area through development within its setting. This is	The location of the Project in relation to the Begbroke Conservation Area is indicated on Figure 3b in ES Appendix 7.1: Historic environment desk-based assessment [APP-131]. This shows that the Project Site does not directly abut the Conservation

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		identified in the ES. As previously suggested because of the small size of Begbroke Conservation Area the listed buildings of The Old Rectory (Grade II), St Michaels Church (Grade II*) and St Phillips Priory (Grade II) (located within the conservation area) and Hall Farmhouse (Grade II) (located outside of the conservation area) will potentially be affected by the development within their setting. The ES only identifies the conservation area and St Michaels Church as being impacted.	Area, with the two separated by a strip of land measuring around 65 m at its narrowest point. The detailed assessment of the likely impact of the Project on the heritage significance of the Conservation Area is presented in paragraphs 1.9.111 – 1.9.114 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment concludes that there would be a 'negligible adverse' impact on the Conservation Area as a result of the change within its setting, resulting in a long-term (time-limited), reversible 'negligible adverse' effect, which is not significant in EIA terms. The detailed assessment of the likely impact of the Project on the Grade II* listed Church of St Michael at Begbroke is presented in paragraphs 1.9.39 – 1.9.41 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment concludes that there would be a 'negligible adverse' impact on the Grade II* listed church as a result of the change within its setting, resulting in a long-term (time-limited), reversible 'minor adverse' effect, which is not significant in EIA terms. Other designated heritage assets within and adjacent to the Begbroke Conservation Area were scoped out of the detailed assessment on the basis that the ZTV developed for the Project along with subsequent site visits indicated that there was no intervisibility between the asset and the Project Site. The Applicant acknowledges that it is possible

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			for the setting of heritage assets to be affected even when there is no intervisibility, but visibility is usually the most important. This is noted in paragraph 10 of the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i> which states ' <i>The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset</i> '. Whilst it is possible for the significance of a heritage asset to be harmed by change within its setting despite a complete lack of intervisibility, this is rare and the outcome in terms of impact and effect is very unlikely to be significant. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach is necessary.
0164	Cherwell District Council	Further south, although the village of Yarnton is not a conservation area, the complex of buildings which includes Yarnton Manor (Grade II*) and the Church of St Bartholomew (Grade I) which sit outside of the village of Yarnton, are considered susceptible to harm through development within their wider setting. This is largely due to their location within the historic landscape.	The Grade I listed Church of Bartholomew at Yarnton, the Grade II Registered Park and Garden at Yarnton Manor and the Grade II* listed Yarnton Manor were all scoped out of the detailed assessment on the basis that the ZTV developed for the Project along with subsequent site visits indicated that there was no intervisibility between the assets and the Project Site. The Applicant acknowledges that it is possible for the setting of heritage assets to be affected even when there is no intervisibility, but visibility is usually the most important. This is noted in paragraph 10 of the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i> which states ' <i>The</i>

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			<i>contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset'. Whilst it is possible for the significance of a heritage asset to be harmed by change within its setting despite a complete lack of intervisibility, this is rare and the outcome in terms of impact and effect is very unlikely to be significant. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach is necessary.</i>
0164	Cherwell District Council	Few non-designated heritage assets (NDHAs) are identified in the ES, however the Kidlington Conservation Area Appraisal does identify the significant non-listed buildings within the conservation area. These are included on CDC's draft list of local heritage assets. It is suggested that even if buildings are not formally included on a local list they can still be identified as non-designated heritage assets and therefore should be considered when assessing the impact on built heritage.	The location of the Project Site in relation to Conservation Areas at Kidlington is indicated on Figure 3b in ES Appendix 7.1: Historic environment desk-based assessment [APP-131]. This shows that the Conservation Area known as The Rookery is just within the defined 2 km settings study area, whilst the Kidlington High Street Conservation Area is partially within the defined 2 km settings study area. As set out in paragraph 1.5.27 of ES Appendix 7.1: Historic environment desk-based assessment [APP-131], both of these Conservation Areas are located wholly within the developed urban area of Kidlington and are not discussed further in any part of the assessment on the basis that the Project Site does not form part of their setting. The same would apply to any non-designated heritage asset located within these Conservation Areas.

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0164	Cherwell District Council	Although only a comparatively small amount of the development site is located within Cherwell District the overall size of the solar installation will unavoidably change the wider landscape in this area and therefore the potential impact on significance of the individual heritage assets due to development within their setting as a result of the overall proposal should not be disregarded.	The Applicant considers that the likely impacts and effects of the Project on the significance of heritage assets within Cherwell District has been undertaken in a thorough and comprehensive manner, and in accordance with all relevant guidance.
0164	Cherwell District Council	In accordance with Paragraph B.267 of the CLP (i.e. the importance of taking "into account heritage assets located outside of the District such as Blenheim Palace, a World Heritage Site") CDC would want the impacts of the development upon Blenheim Palace to be thoroughly examined.	The Applicant's assessment of likely impacts and effects of the Project in respect of the Blenheim Palace World Heritage Site is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England. The Heritage Impact Assessment identified a likely 'minor negative' impact on one attribute (Attribute 7) which contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. The overall assessment of likely impacts and effects of the Project on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been

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			assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4, [APP-141]). The impact would be long-term (time-limited) and fully reversible. The sensitivity/value of the WHS is determined as 'very high', resulting in a likely effect of 'minor adverse' significance, which is not significant in EIA terms. The Applicant notes that in their Relevant Representation (RR-0398), Historic England does not disagree with the Applicant's assessment of likely impacts and effects of the Project in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4, [APP-141]), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment [CR1-003]. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS. The Applicant also notes that in their Relevant Representation [RR-0413], ICOMOS-UK state that <i>'the proposed Botley west Solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map 'Character of Setting of WHS' on page 50 of Appendix III of the Management Plan'</i>. ICOMOS-UK is the UK National Committee of ICOMOS

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			(International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the Outstanding Universal Value (OUV) of the UK World Heritage Sites and their settings is one of their key objectives.
4. Landscape and Visual Impacts			
RR-0164-017	Landscape & Visual Impacts	CDC has been involved in pre-submission meetings with the developer and has provided feedback in relation to the methodology and approach taken in assessing the landscape and visual impacts of the development. 8 Though it appears that previous comments raised by Cherwell's Landscape Architect have been addressed in Chapter 8 – Landscape and Visual Impact Assessment of the ES with the inclusion of the security fencing, substation, secondary substations and power convertor stations there is still concern that the development would result in significant change and harm to the predominantly open and rural landscape character of the application site. The scheme would also have potentially harmful impacts upon the settings of villages and Blenheim Palace. CDC do not agree that the visual impacts, as experienced by users of the PRow, can be satisfactorily mitigated with hedge planting on either side of footpaths/bridleways and it is contended that walking in an enclosed green corridor between new hedge planting would not adequately compensate for the experience of walking in open, sloping farmland with longer distance views. CDC observes that Landscape Architects representing VWHDC and OCC have outstanding concerns regarding the Methodology and Assessment utilised in the LVIA (particularly in respect of the definition of 'temporary' and how the significance of impacts has been applied). CDC would like this to be scrutinised during the examination and expects to present further comments and evidence on the	In relation to the methodology and approach in assessing the landscape and visual impacts of the Proposed Development, neither the EIA Regulations nor GLVIA3, or subsequent landscape Institute technical guidance notes set out a formulaic/standard set of criteria / definitions for sensitivity, magnitude of impact or significance. The phrase 'significant in EIA terms' holds no specific meaning (GLVIA3, paragraph 3.32). The LVIA uses the methodology set out at Section 8.4 and 8.5 [APP-045]. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24). The assessment of the significance of effects that would be experienced by users of the Public Rights of Way, as set out in paragraphs 8.6.45 to 8.6.61 of the LVIA, follows that methodology. GLVIA3 explains that <i>"There are no hard and fast rules about what makes a significant effect, and there cannot be a standard approach since circumstances vary with the location and</i>

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		landscape and visual impacts of the proposals in the LIR and during the examination.	<i>landscape context and the type of proposal</i>" (paragraph 5.56). GLVIA3 also notes that <i>"Even with qualified and experienced professionals there can be differences in the judgements made" ... "Ideally and for complex projects more than one person should be involved in the assessment to provide checks and balances, especially in identifying the likely significant effects"</i> (GLVIA3, paragraph 2.25). Three Chartered Members of the Landscape Institute, all with experience of assessing the effects of solar farms have worked on the Project, with their findings detailed within the LVIA [APP-045]. Additional checks and balances have been provided by other, experienced practitioners, Chartered Members of the Landscape Institute, within RPS, who have not been involved with the Project. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape, with some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed in the Illustrative Masterplan [APP-062], would allow for a more generous corridor, 5 m minimum width, within which the public rights of way would pass, in the majority of cases. The restoration of hedgerows and creation of new hedgerows would reinforce the structure of the landscape.

5. Local Ecology and Nature

RR-0164-018	Birds.	The sites support a large assemblage of breeding and wintering birds many of which are red list, Priority or protected species. Whilst the CDC's Ecologist understands from the text that areas of archaeological importance would be managed as grassland to benefit species	The locations of areas of archaeological interest are displayed in the Illustrative Masterplan [AS-020] . They cover an area of circa 36ha and will offer a

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		associated with farmland, they could not tell the extent of this area and whether it would offer sufficient opportunity to offset the loss of habitat to these birds and other farmland species such as Brown hare. The timing of cutting of grassland should not include April if the intention is to provide skylark nesting habitat. The purpose of the proposed skylark plots (11.6 of oLEMP) seems unclear. They do not fit in with the description and management for AB4 of the Countryside stewardship and management as stated. Skylark plots are known to be successful in supporting skylark numbers when provided in areas with an open aspect - which a field of solar arrays would not really provide. Leaving areas unsown within the grassland around the arrays is unlikely to perform the same function as undrilled areas in winter crops (which ensure there are areas which are not too dense or high for skylarks to access). Skylark will nest and forage in grassland if the sward is not too high although this is unlikely in an array field. The Council requests that evidence of the efficacy of leaving 5mx5m bare plots in solar array fields, in mitigating for losses to farmland birds, is included in the justification.	permanent resource of grassland managed for both wintering and breeding birds. Section 8.7 of the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235] sets out the mitigation measures with respect to breeding bird (including skylark) with respect to grass cutting, specifying (8.7.3) that such cutting would take place in autumn to allow birds to finish breeding. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species.
	Bats.	An assemblage of bats of National importance, including two Annex II species utilise the woodlands and intervening habitats adjacent to, within and across the site for roosting (including maternity), foraging and commuting. There is currently only brief information on how these bats could be impacted. There is no assessment of whether the scale of the proposals, with large areas of solar arrays, could have a discouraging impact on the movement and foraging of these bat species. The Council requests that more information on this aspect be required to provide certainty that these species would not be negatively affected.	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and

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			full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.
	Ancient woodland.	The mitigation measures state a minimum of a 15m buffer will be retained to ancient woodland areas in line with NE guidance however it should be noted that The Woodland Trust recommends a 50m buffer (Planning for ancient woodland: planners manual for ancient woodland and veteran trees, July 2019) unless otherwise justified. To reduce the chance of edge effects on woodlands a larger buffer should be considered wherever possible.	The minimum 15 m buffer to ancient woodland will be implemented in accordance with government guidance (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions). It should be noted that this is the minimum distance to be adopted; in many locations the buffer to ancient woodland would be considerably larger.
	Biodiversity Net Gain.	A biodiversity metric in full has not yet been submitted. This would be a very large document and so the Council do not object to a summary however a full metric (perhaps split by area) should be submitted to LPAs at some stage so it can be appropriately assessed. If there are ditches on site then watercourse units should be calculated. CDC's Ecologist would also propose that the river corridor is included within the calculations of watercourse units due to its proximity to the site.	The Statutory Biodiversity Metric (DEFRA, 2024) is completed and appended to Appendix 9.13 Biodiversity Net Gain Assessment [APP-162]. In consultation with Natural England, the watercourse section of the metric will be assessed and completed for all watercourse associated units on the project site.
6. Hydrology and Flood risk			
RR-0164-0019	Hydrology and Flood Risk	Acknowledging that OCC are the Lead Local Flood Authority this Council would like to make a number of observations. None of the sites within Cherwell appear to be in Flood Zones 2 or 3 but this might require further analysis when more detailed proposals are available.	No response required.

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		If any are found to be in the flood plain the implications will be fairly minor in that the displacement caused by the supporting posts will have to be compensated for. The Council do not consider this to be a major concern in principle.	
	Utilities	The installation of Utilities that cross under ditches and watercourses by trenchless techniques is the preferred method. Further consideration, in liaison with the other Local Authorities, is needed to establish if Land Drainage Act consents will be required for this. Regarding concerns about drip lines under the panels, the Council would expect to see the run-off from the panel fall onto filter drains and attenuation provided either within the drains themselves or at the end of each line or area before discharging to a ditch or watercourse. This would be a matter for the detailed design stage and could be covered by a requirement in the DCO.	The inclusion of pre-works and post-works surveys of flood assets, including field drainage, will be added as a commitment to an updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. This commitment will also ensure that field drainage is restored for the operational life of the development. As part of the Project, solar arrays are to be placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. In addition, gaps are proposed between solar cells themselves, so that water will not fall from the lowest leading edge. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at the detailed design stage to ensure that the ground does not become bare due to the lack of maintenance, and therefore, the peak runoff discharge does not increase over time. The sloping ground in this case will improve solar exposure. This is anticipated to mimic the existing baseline conditions and prevent all the water from reaching the lowest leading edge. This is favourable, where possible to prevent extensive drainage and piping across the site. However, the requirement and

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7. Ground Conditions			consideration of filter drains can be captured at the detailed design stage, where required.
RR-0164-020	No further comments	CDC welcome the inclusion of mitigation in the form of further investigation/remediation and a watching brief and procedures to be followed in the event of unexpected contamination being encountered as per the suggested requirements in the Council's S42 response to the applicant on 08 February 2024. Similarly, the Council welcomes the inclusion of a Materials Management Plan and the export of incidentally extracted excess sand and gravel for reuse off site in the proposed mitigations as previously recommended. The Council's Environmental Protection team have no comments on this chapter of the ES.	It is acknowledged that the Cherwell District Council Environmental Protection team has no comments on the Ground Conditions chapter of the ES.
8. Traffic Transport and Access			
RR-0164-021	Cherwell District Council	Traffic and Transport. This topic will be dealt with by Oxfordshire County Council as the Local Highways Authority.	The Applicant notes this and confirms there has been ongoing liaison with Oxfordshire County Council prior to submission of the application for the Development Consent Order as set out in Table 12.5 of ES Volume 1, Chapter 12 [APP-049] with those discussions continuing to ensure they are satisfied with traffic and transport matters.
9. Noise and Vibration Impact			
RR-0164-022	Cherwell District Council	CDC welcome the use of embedded noise mitigation but have queried the construction hours. CDC recommend that construction hours are limited to the following: 07.30H-18.00H Monday to Friday, 07.30H-12.30H on Saturdays and no time on Sundays, Bank and Public Holidays.	The Applicant confirms that the Outline Code of Construction Practice [APP-232 & 233] (oCoC) at Section 1.8 General Requirements, paragraph 1.8.2, seeks core working hours for the construction phases of the Project, to be secured through the DCO, and that these are proposed to be 07:00 to 19:00 Monday to Saturday.

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The working hours for the Construction of the Solar Farm, have been calculated based on 7am-7pm, Monday to Saturday 52 weeks of the year, this is required to minimise the overall Construction programme period. This will be used bring in people and materials to the 4 Construction compounds, and access sites, in a safe phased manner. This helps manage traffic flow, logistics and welfare for the operatives arriving, working on the site and departing.			
10. Climate Change			
RR-0164-023	Cherwell District Council	CDC declared a climate emergency in 2019 and are seeking to ensure that our own operations and activities are net carbon neutral by 2030 and to support the District to become carbon net zero. Our 2020 Climate Action Framework says that we will reduce our demand for grid electricity and generate our own clean energy. It also indicates that one of the actions required towards halving the District's emissions by 2030 is to increase solar by 5 times. It is recognised that these proposals could make a potentially significant contribution towards reducing carbon emissions.	Noted.
11. Socio Economics			
RR-0164-024	Local Business and Economy	CDC welcome the assessment of impacts during all phases of the development upon tourism in the area and the acknowledgement that the sensitivity of tourism as a receptor is medium.	Noted.
12. Human Health			
RR-0164-025	Reduced access to PRow and associated health impacts	The Council's Environmental Protection team have no comments to make on this chapter of the ES. CDC note the assessment of reduced access to PRow within the ES and the impacts that this would have on health.	We note that Cherwell District Council's Environmental Protection team have no comments to make regarding the Human Health chapter of the Environmental Statement (ES). With regard to the observation of reduced access to Public Rights of Way (PRow) the primary

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			analysis of landscape effects is set out in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and the primary analysis of public rights of way (PRoW) effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRoW [APP-054]. Volume 1, Chapter 16: Human Health of the Environmental Statement (ES) [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. The Chapter 16 assessment discusses how particular consideration has been given to creating greenways (with width, hedges, trees and trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. As set out in Chapter 16 section 16.9 the PRoW network is maintained during the project with suitable pedestrian access for diversions of any temporary route closures and appropriate wayfinding information for temporary diversions being provided. New permitted paths are introduced, and parts of the PRoW network are upgraded.

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			Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out how hedgerow growth and gapping up will occur to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which also sets out measures to promote use of the PRow network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring to determine if any additional measures to avoid widespread behavioural change in use of PRow is required.
13. Agricultural Land Use and Public Rights of Way			
RR-0164-026	Cherwell District Council	The ES chapter on Agricultural Land Use and PRow is based upon an Agricultural Land Classification (ALC) survey carried out on behalf of the applicants. The ALC survey does not breakdown the areas by district, but it is clear from looking at the maps in Figure 17.3, 'Surveyed ALC Grades' that, proportionally, more of the site within the Cherwell District comprises land of the higher quality Grades 2 and 3a than the other districts. Looking at the illustrative masterplans CDC would question why the location of panels has been amended to omit areas of archaeological interest and to allow for sky lark plots but not to preserve areas found to be of the higher quality agricultural grades. This has not been addressed in the Planning Statement and there would appear to be justification for removing panels from certain parts of the site which	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the whole Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]) The assessment of the significance of effects of the Project on ALC identifies that only 5.5ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6).

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		are of Grade 2 and 3a quality. Within Cherwell the area to the north-west of The Priory in Begbroke and the field to the south of London Oxford Airport (east of A44) should be considered for removal. There are also notable areas of Grade 2 within West Oxfordshire District to the south and east of Church Hanborough and to the north and north-west of Cassington which are of Grade 2 quality which should also be reconsidered. The proposed mitigation measures and requirement for the provision of a Soil Management Plan are welcomed to preserve agricultural land quality and ensure that land is restored after decommissioning to its existing quality and condition for arable use. It should therefore provide details of how the land will be reinstated to its former condition at the end of the use, also providing information about the 'reversibility' of the development, and how quickly the land could be returned to food production (arable and grazing) once the solar farm has come to the end of its life. The experience of using the PRow within and close to the application site will be substantially and detrimentally impacted. Currently, most PRow within the application site provide access to tranquil, rural, undeveloped land that allows open views between existing settlements. Whilst the proposed development would retain all the existing PRow in terms of accessibility, the experience of using them would be significantly different. Users will find themselves either within enclosed hedge lined corridors or looking across large expanses of solar panels, security fencing and secondary substations.	In terms of the distribution of grades, according to the provisional mapping of ALC grades within Oxfordshire, the county comprises approximately 20.9% Grades 1 and 2 land, 58.5% of Grade 3 land (which includes both Subgrades 3a and 3b) and 20.1% Grade 4 land (Table 17.14 of ES Chapter 17 [APP-054]). If only one third of the provisionally mapped comprised Subgrade 3a land, this would provide an estimate of an average of 40.4% Grades 1,2 and 3a in Oxfordshire. The detailed ALC survey results for the Project site (Table 17.17 of ES Chapter 17) identify that only 7.4% of the land comprises Grades 1 and 2 land, with approximately 29% Subgrade 3a land. In comparison to the pattern of land quality that might be expected in the wider county, therefore, the distribution of land quality grades within the Project site comprises a typical, if not slightly lower average percentage of the best and most versatile land. As identified by Cherwell District Council Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). In response to the question of how quickly the land could be returned to food production (arable and grazing) once the solar farm has come to the end of its life, the Applicant proposes to retain

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			agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). The implementation of the Soil Management Plan would enable the soil quality of the land to be maintained through the decommissioning process and any decisions about changes to the pattern of land management beyond the proposed operational agricultural use would be a matter for the owners and farming enterprises occupying the land to determine at that time. A minimum of 5m width has been allowed for public rights of way between hedge boundaries. In many locations this has been significantly increased, as shown in Figure 7.6.3.2 of the oLEMP [APP-235]. Additionally, new permissive footpath and cycle path routes would be created. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. For example, between Bladon and Campsfield.
14. Waste and Resources			
RR-0164-027	Cherwell District Council	CDC have no comments on waste and resources at this time.	Noted

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
15. Air Quality			
RR-0164-028	Cherwell District Council	CDC have no comments on the matter of air quality at this time.	Noted
16. Aviation and Safeguarding			
RR-0164-030	Cherwell District Council	Aviation Activities CDC are aware of a number of concerns from London-Oxford Airport about impacts on aviation relating to: • Glint and glare; • Thermal plumes affecting radar and causing turbulence; • Firefighting response within 1km of the airport; • Electromagnetic Interference (EMI) which could affect communication and navigation; • Increased risk of bird strike and collisions with animals caused by birds mistaking solar arrays for lakes and wildlife being displaced from areas with panels; Whilst an assessment of Glint and Glare has been carried out and a number of mitigations have been recommended as a result, all these matters will need to be appraised during the examination.	Pager Power has produced a Glint and Glare Study and a Technical Aerodrome Safeguarding Report considering any potential impacts from glint and glare, thermal plume, turbulence, and electromagnetic interference. It is not within Pager Power's expertise to comment on the firefighting response nor risk of bird strike, but these are considered elsewhere within the RR responses under the Fire Safety and Ecology Sections. On the issue of increased bird strike risk, habitat change effects are unlikely to exceed existing environmental factors, such as nearby roads, infrastructure, and the Oxford Airport business park. These features already produce similar landscape dynamics, which birds, pilots and aviation operations currently manage safely.
Draft Development Consent Order	Cherwell District Council		

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		Host authorities will provide detailed comments on the draft DCO. The key issues for focus will include the scope of the authorised development, the schedule and drafting of requirements. CDC expect their views on the drafting and approvals process for DCO requirements to be given significant weight in their role of ensuring that the impacts upon our local environment and communities are minimised, and as an approving and enforcement authority.	The Applicant welcomes CDC's ongoing feedback on the draft DCO through examination, noting its role as an approving and enforcement authority.

17. Community Benefits

RR-0164	Cherwell District Council	Although Community Benefits are not a material planning consideration CDC would like to draw attention to the fact that host authorities are working with affected parishes on a suitable mechanism for collecting and implementing a community benefit fund as a means by which to secure benefits if the project receives planning consent. The amount currently being offered by the applicant (£200,000 p/a) is considered inadequate for a development of this scale. Negotiations on a community benefit agreement (CBA) are therefore expected to continue alongside the planning process and will be supplemental to any section 106 agreement required to mitigate the adverse impacts of development	The Applicant acknowledges the concerns and notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant. The fund will be part of a Community Benefits package outside the scope of the DCO application, to be agreed with the relevant local authorities. (See Planning Supporting Statement paragraphs 3.5.24 and 8.4.71 APP/7.1). The Applicant has held discussions with Parish, District and County Councils and has now agreed to an annual fund payment of £525 per MW, £441,000. This will deliver £16,500,000 over the 37.5 year life of the project, before indexation. The Scottish figure of £5000 per MW is applicable to onshore wind turbines, not solar farms.



Botley West Solar Farm

Applicant Responses to Relevant Representations -
Oxfordshire County Council [RR-0793]

June 2025

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I. Applicants' Comments in response to the Relevant Representation submitted by Oxfordshire County Council [RR-0793]

Table II-1: Applicants' Comments on Relevant Representations

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
1. Climate Change			
RR-0793-056, RR-0793-058 and RR-0793-060	Climate-related hazards	Climate Risks In reviewing ES Chapter 14, it is considered that the Chapter lacks sufficient detail to support the exclusion of climate related hazards from being assessed as part of the ES.	Increased ambient temperatures as a result of climate change were scoped out as the manufacturing standards for PV modules IEC TS 63126:2020, IEC 62548 and IEC 61215-1:2021 require modules to be functional over a wide range of temperatures, humidity and UV radiation. As such, the potential for small system efficiency losses due to hotter temperatures during the Project's lifetime are not considered to have any potential to significantly affect the lifecycle GHG emissions and thus significantly reduce the environmental effect of the renewable electricity generation. Table 14.6 of the climate change chapter (Volume 1 Chapter 14 (APP-051) confirms additional detail on the justification in line with the planning inspectorate's comment on scoping (Table 14.6 of Volume 1 Chapter 14 (APP-051)). Extreme weather events such as storms with high winds are also possible in the existing and future baseline and the Project's design will need to account for this. Manufacturing standards for PV modules (listed above) require consideration for extensive weathering (such as from hailstorms) and extreme thermal fluctuations. As such, extreme weather events are not considered to cause significant environmental effects to the Project. The Applicant prepared material at the scoping stage which detailed the methodology and approach

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			undertaken at that time concerning potential climate change effects on the Project, and which were scoped out of the climate change chapter [APP-051].
RR-0793-056	Council's Net Zero Targets	The project aligns with OCC's target of becoming a zero-carbon County by 2050.	The Applicant notes this point.
RR-0793-057	Decommissioning	Greenhouse gas emissions (GHG) assessment associated with decommissioning has now been included and reference to an Outline GHG Reduction Strategy.	The Applicant notes this point.
RR-0793-060	Climate Change Resilience Review	Climate Change Resilience Review - The Council considers a separate section should be dedicated to Climate Change Resilience Review, that way it is clear on the nature of climate hazards that could potentially impact the construction, operation and maintenance (O&M) and decommissioning stages.	The Applicant has prepared a document (Ref Appendix 2 of the ISH1 Written Summary) which details the methodology and approach undertaken at the scoping stage concerning potential climate change effects on the Project which were scoped out of the climate change chapter (APP-051). The Outline Operational Management Plan (APP-234) which has been submitted in support of the application is an outline plan. The full document which would be completed before operation of the development commences would include increased detail as to how the site would be managed and maintained in operation and will be included concerning O&M reviews.
RR-0793-059	Regular maintenance of the Scheme	Our recommendation is that the applicant considers incorporating a climate risks review into the maintenance process. That would enable the applicant to better understand the potential risk changes and impacts associated with climate related events, such as extreme weather, temperature changes, or dust	The Outline Operational Management Plan (APP-234) which has been submitted in support of the application is an outline plan. The full document which would be completed before operation of the development commences would include increased detail as to how the site would be managed and maintained in operation.

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RR-0793-061	Climate Adaptation	Possible climate adaptation measures	The Applicant has prepared a document (Ref Appendix 2 of the ISH1 Written Summary) which details the methodology and approach undertaken at the scoping stage concerning potential climate change effects on the Project which were scoped out of the climate change chapter (APP-051). As such, no adaptation or mitigation measures beyond those included within the climate change chapter (APP-051) are proposed. The Applicant notes the Council's points concerning potential adaptation measures and will consider the feasibility of such at the detail design stage.
2. Planning Policy			
RR-0793-011	Minerals	Minerals As Oxfordshire's Mineral and Waste Planning Authority, we object to the development on the grounds that the proposal is contrary to policy M8 of the Minerals and Waste Core Strategy. The adopted Policy M8 states; "Mineral resources in the Mineral Safeguarding Areas shown on the Policies Map are safeguarded for possible future use. Development that would prevent or otherwise hinder the possible future working of the mineral will not be permitted unless it can be shown that: • The site has been allocated for development in an adopted local plan or neighbourhood plan; or • The need for the development outweighs the economic and sustainability considerations relating to the mineral resource; or • The mineral will be extracted prior to the development taking place.	The Planning Supporting Statement (PSS) [APP-7.1] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 7. The relevant adopted and emerging policies of the various local Development Plans are considered within each Chapter of the ES, and are also weighed in the planning balance in the PSS. The mineral referred to by OCC is an identified safeguarded resource of sharp sand and gravel, but not an allocated reserve. The effects of the proposed development upon the resource is provided in the Applicant's Mineral Resource Assessment (MRA), Appendix 11.14 [APP-195], and areas of potentially viable sand and gravels are shown in Figure 10, relative to the Order Limits.

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		The case for building the part of the solar farm that would prevent or otherwise hinder future mineral working and possibly sterilise the mineral resource has not been justified.	The Applicant's MRA includes consideration of the need for the development against sterilisation (which will not be permanent), and the practicality of prior extraction. The total prior extraction of materials, and associated overburden, once buffer zones and the fragmented land parcels are factored in, has not been considered viable in the Applicant's assessment, and the MRA considers that the need for the solar farm development does outweigh the economic and sustainability considerations of extraction, even though the resource is not permanently sterilised.
RR-0793-067	Allocations	Interactions with Local Plan Allocations 13.1 The DCO redline area and cable route appear to be adjacent to or overlapping with the proposed Woodstock housing allocation (KID H1 South East of Woodstock) and land safeguarded for the A44 Mobility Hub (policy KID 3) in the Cherwell Regulation 19 Local Plan. The solar farm must not in any way hinder the delivery of these two sites.	The Applicant does not believe that the residential area designation, or the Mobility Hub designation is in direct conflict or otherwise incompatible with the Applicants' proposals. However, the Applicant is discussing the degree of any conflict arising from these designations and will resolve these through the Statement of Common Ground with the County and other host authorities.
3. Cumulative Impacts			
RR-0793-003	Future Cumulative Effects	Other solar farms, in addition to potential supporting infrastructure related to Botley West, are going to be developed in the future. The Applicant has not acknowledged this and the cumulative impact these will cause. It is essential that the impacts of all elements related to this development are assessed comprehensively to understand the landscape and visual impact of the development on the area. Given the grid connection is essential for the proposals, the DCO should restrict	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057]. This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. Any future developments will carry out their own cumulative assessment, and, as such, they will be appropriately assessed against cumulative schemes when they come forward.

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		development until permission has been granted for the additional substation.	The delivery of the NGET substation was assessed both within the Order Limits, and cumulatively on land immediately to the west of the Southern Site, which is NGETs preferred location.
4. Landscape and Visual Impacts			
RR-0793-005	Landscape Impacts	The development will replace large areas of agricultural land with solar development. By reason of its nature, mass and scale, the proposed development will alter the landscape character at a large scale affecting the current openness, tranquillity and agricultural character. It will also significantly affect visual amenity, with effects on the PRoW network and nearby residential areas being of particular concern. The development as proposed is not supported in landscape and visual terms. Further information and revisions are required to address concerns in relation to the LVIA, layout and design (including design evolution, scale, extent, siting), mitigation, impacts on vegetation and ongoing management to reduce the impact of the proposal. The DCO application proposes a standard minimum buffer of 25m to adjacent residential areas (i.e. an increase by 5m from the PEIR), however, this distance does not appear to be informed by any assessment work, and the justification for this approach is not clear. We believe that the distance and treatment of buffers should be determined on a site-by-site basis and informed by assessment work. Adverse effects on heritage areas and their setting are also a concern.	The impacts of the Project upon landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the Landscape and Visual Impact Assessment [APP-045]. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The 55 Representative Viewpoints were consulted on and agreed with all host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA

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			methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045]. Wytham Woods is a privately owned woodland, with access by appointment. As such, there is no general public access. Although the Project will be partly visible in views from more open parts of the woodland and at the edge of it, no significant effects have been identified from Representative Viewpoints within or at the edge of Wytham Woods. Including Representative Viewpoints 42, 43 and 44. A photomontage (winter and summer) was completed to illustrate possible effects from Representative Viewpoint 42. The Landscape and Visual Impact Assessment [APP-045] has identified significant effects upon visual amenity, particularly from Public Rights of Way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP-045], at a very local level or where it would not be possible to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape. The solar PV arrays have a maximum height of 2.3m and follow the natural contours of the local landscape. This would help to reduce the effects

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			upon the undulating landform of the Evenlode Valley and local area within which the Project is located. The ecological effects of the proposed solar farm on Wytham Woods SSSI and Wychwood are assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. The effect on the setting of Oxford as a historic asset is assessed in ES Chapter 7 - Historic Environment [APP-044]. Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that <i>"infrastructure to achieve our energy objectives national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation"</i> (NPS EN-1, paragraph 3.3.63). The NPS explains further that <i>"projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero"</i> (NPS EN-1, paragraph 4.1.7). The residual landscape and visual effects, after the proposed mitigation do not present an unacceptable risk to the matters listed. NPS EN-3 explains that <i>"Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation of the site"</i> (NPS EN-3, paragraph 2.10.42). The physical detailed effects on

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			the public rights of way network are considered in ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. NPS EN-3 encourages Applicants to <i>"minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape"</i> (NPS EN-3, paragraph 2.10.43). It also requires Applicants to <i>"consider and maximise opportunities to facilitate enhancements to the public rights of way and the adoption of new public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights or the creation of permissive paths)"</i> (NPS EN-3, paragraph 2.10.44). As detailed above, NPS EN-3 encourages Applicants to minimise the visual impacts of developments. This has been achieved through the production of the Illustrative Landscape Masterplan [APP-062]. This has considered and minimised landscape and visual impacts as set out in NPS EN-3. Professional judgement was used to determine a minimum 25 m buffer zone, from individual properties and settlements, has been incorporated into the Project. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which further limits the effects of the Project. Mitigation, as shown on the Illustrative Masterplan

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			[APP_062] and the Landscape, Ecology and Amenities Plan [APP_228], was included to further screen available views from residential properties.
5. Hydrology and Flood Risk			
RR-0793-010 Oxfordshire County Council	Surface Water Drainage	The proposals for surface water drainage across the site would be acceptable if further supporting information was provided, to include ground investigation reports, a more detailed drainage layout with identified discharge locations, updated calculations to correspond with the drainage layout, updated water quality and maintenance requirements, and further detail on how the field beneath the panels will be managed during construction, operation and reinstatement. Notwithstanding the above, OCC is concerned about the proposed protective provisions included at Part 3 of Schedule 15 to the draft DCO and is unconvinced by the various departures from the tried and tested consenting process under the Land Drainage Act 1991. In relation to Schedule 15: Protective provisions, Part 3: For the Protection of Drainage Authorities, OCC have an agency agreement with each District Authority in relation the determination of consents for works on Ordinary watercourse under the requirements of Land Drainage Act 1991 (LDA). This agreement provides for these consenting activities to be undertaken by the District/city Council on behalf of the County in accordance with the LDA, including the requirements and timescales as set out in section 23 (prohibition on obstructions etc. in watercourses) of that Act. OCC have significant concerns in relation to	No formal drainage connections have been proposed for the solar panels at the site. However, the Solutions Index Approach will be added to Appendix 10.2 Conceptual Drainage Strategy [APP-174] for the ancillary features where required to provide more clarity on water quality treatment. The development will not commence construction until a Construction Surface Water Management Plan has been approved by the LPA in consultation with the LLFA in order to evidence adequate provision both in terms of runoff quantity (flow rates and volumes) as well as quality (pollution mitigation). This requirement will be added to 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233]. Section 120 of the PA 2008 makes comprehensive and wide-ranging provision about what may be included in a DCO, as part of the PA 2008's integrated approach to consenting. Section 120(5) provides that, subject to specified limitations and requirements, a DCO may apply, modify or exclude a statutory provision which relates to any matter for which provision may be made in the Order; and make amendments, repeals or revocations of statutory provisions of local application. It is common for DCOs to contain such provisions to ensure that the DCO is a 'one-stop-shop' to consenting Precedent for the disapplication of the Land Drainage Act 1991 provisions at Article 6(1)(a)-(c) of the draft DCO [AS-009] can be found in the Longfield Solar Farm Order 2023, the Sunnica Energy Farm Order

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		the proposed Protective Provisions, particularly the short deadline (28 days) for determining applications for approval under paragraph 3 before consent is deemed to be granted. OCC has other concerns with the proposed Protective Provisions and would welcome discussions with the Applicant in respect of them. In any event, these concerns will be detailed in the Local Impact Report. As currently drafted, OCC are not in a position to agree the Protective Provisions. Furthermore, the consenting process under the LDA is clear about what requires approval, and local authorities are familiar with the requirements and time frames in which consent is deemed granted. We therefore see little justification to have specific provisions that alter the requirements of the LDA in respect of this project.	2024, the Mallard Pass Solar Farm Order 2024, the Gate Burton Energy Park Order 2024 and The East Yorkshire Solar Farm Order 2025 (non-exhaustive list). These disapplications are sought on the basis that they address matters whose merits and acceptability can, and will, already have been sufficiently considered and resolved if the Order is made, through protective provisions for the protection of OCC as the relevant drainage authority (Part 3 of Schedule 15 to the Order). The Applicant's position which aligns with the standard approach on earlier comparable projects is that the matters should therefore not be the subject of further regulatory consideration or control, which would cause unnecessary uncertainty and duplication, and may unjustifiably delay the implementation of the Project. The Applicant notes that the protective provisions at Part 3 are standard form and readily agreed across many made solar DCOs. However, the Applicant appreciates that the consent of OCC is required as Lead Local Flood authority in order to facilitate disapplication's under the Land Drainage Act 1991. The Applicant would welcome comments from OCC on its specific concerns with the drafting of the protective provisions at Part 3 to consider whether a bespoke set of protective provisions is required.
RR-0793-049 Oxfordshire County Council	LLFA	The submitted surface water drainage proposals have been reviewed by the LLFA. Please note that the LLFA primarily comments on surface water drainage, and flood risk where it may impact the functionality of the surface water drainage system. Comments from the Local Planning Authority district drainage engineers and	No response required.

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		Environment Agency will be required for a full overview of the flood risk present at the proposed development site.	
	Solar Panels	6.2 The solar panels themselves have no formal drainage proposed. The LLFA has previously commented that this is acceptable in principle, however it is important that there is a requirement in the DCO to maintain suitable vegetation cover beneath panels, and to ensure that the soil is not compacted by machinery during construction and maintenance. This should help to retain the existing greenfield runoff rate of the site. Where runoff from panels may cause localised erosion, consideration should be given to filter drains or an enhanced maintenance schedule for the soil/vegetation. Additional cutoff drains could be incorporated at the site boundaries as an additional measure.	As part of the Project, solar arrays are to be each placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. In addition, gaps are proposed between solar cells themselves, so that water will not fall from the lowest leading edge. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at the detailed design stage to ensure that the ground does not become bare due to the lack of maintenance, and therefore, the peak runoff discharge does not increase over time. 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233] includes mitigation measures for soil management (e.g. where construction has resulted in soil compaction, the areas between panel rows would be tilled/scarified to an appropriate depth and then re-seeded with an appropriate vegetation cover).
	Discharge Locations	6.3 Access tracks are to be permeable, which is acceptable. Infrastructure that does require formal drainage has been considered; however the detail required for typical outline development has still not been provided, despite the issue being raised in earlier	A formal drainage plan is to be provided to detail the discharge approach and locations and details for the following infrastructure: NGET substation and Applicant Substation. This will be provided as further details come to light at the Detailed Design stage. In

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		consultation responses. The discharge location must be identified for all drainage features. If this is to be the ground, then infiltration testing and winter groundwater monitoring results should be provided in support of an infiltration drainage design. If it is to be a watercourse, the discharge locations should be identified on a drainage layout. Calculations have been provided in support of an attenuation strategy with restricted discharge to a watercourse.	lieu of this, calculations and outline details have been provided in Appendix 10.2 Conceptual Drainage Strategy [APP-174] .
	Pollution Mitigation	6.4 Once an outline drainage strategy has been developed, further consideration of any pollution mitigation measures and maintenance requirements can be made. The surface water drainage details submitted should be in accordance with the relevant checklists provided in the Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire, available online	Formal drainage is not required for the majority of the site, as it is proposed to utilise the existing ground and/or gravel subbases beneath minor ancillary infrastructure. A formal drainage plan is to be provided to detail the discharge approach and locations and details for the following infrastructure: NGET substation and Applicant Substation. This will be provided as further details come to light at the Detailed Design stage. In lieu of this, calculations and outline details have been provided in Appendix 10.2 Conceptual Drainage Strategy [APP-174].
	Construction Phase	6.5 The LLFA would like to see consideration given to surface water management during the construction phase, this may be included in a Construction Environmental Management Plan (CEMP). The Applicant should provide detail as to decompaction measures to be employed post construction to ensure maximum infiltration potential is preserved.	The development will not commence until Construction Surface Water Management Plan have been approved by the LPA in consultation with the LLFA in order to evidence adequate provision both in terms of runoff quantity (flow rates and volumes) as well as quality (pollution mitigation). The requirement for this will be added to 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233] . Mitigation measures for soil management will also be included in these documents and implemented (e.g. where construction has resulted in soil compaction, the areas between panel rows would be tilled/scarified to an appropriate depth

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	Summary	6.6 In summary, the proposals for surface water drainage across the site would be acceptable if further supporting information was provided, to include ground investigation reports, a more detailed drainage layout with identified discharge locations, updated calculations to correspond with the drainage layout, updated water quality and maintenance requirements, and further detail on how the field beneath the panels will be managed during construction, operation and reinstatement.	and then re-seeded with an appropriate vegetation cover). Formal drainage is not required for the majority of the site, as it is proposed to utilise the existing ground and/or gravel subbases beneath minor ancillary infrastructure. A formal drainage plan is to be provided to detail the discharge approach and locations and details for the following infrastructure: NGET substation and Applicant Substation. This will be provided as further details come to light at the Detailed Design stage. In lieu of this, calculations and outline details have been provided in Appendix 10.2 Conceptual Drainage Strategy [APP-174].
6. Local Ecology and Nature			
RR-0793-006	Ecology introduction.	The additional survey work undertaken to inform the ES is welcomed but until the following issues are resolved the application cannot be supported in ecological terms: • Further information on the impact and mitigation requirements for bat populations is required. • Further survey of otter and water vole required. • The proposed skylark plots are unlikely to be successful; as previously requested, a farmland bird strategy for the proposed development is required which should consider the need for off-site measures as well as incorporating features for birds within the scheme. • As raised in our EIA scoping response, an assessment of the potential effects on wetland birds and aquatic invertebrates during the operation of the solar farm must be undertaken.	Issues raised in this introduction are responded to in turn below.

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		- Clarification over the proposed licence arrangement for Great Crested Newts is required. - Detail around resourcing and funding for the monitoring and enforcement of the numerous Landscape and Ecological Management Plans is required.	
RR-0793-023	Mitigation.	2.1 Overall, it is apparent that previous comments relating to the need for further ecological survey have largely been addressed. In fact, ecological survey over this significant area of Oxfordshire has highlighted the presence of some important species for the County, most notably the presence of maternity roosts for Bechstein's bats (a rare species, not previously recorded breeding in Oxfordshire) and barbastelles, as well as the presence of dormice and nightingale which are very rarely reported in Oxfordshire. These are exciting records for the County, and whilst it is likely that many of the important species found can be accommodated alongside the scheme (perhaps with the exception of farmland birds), we have some concerns that it is not apparent in every case how the ecological surveys have informed design of the scheme to both mitigate impacts and provide species -relevant enhancements.	The approach to mitigation is provided in ES Volume 1, Chapter 9, Section 9.8 [APP-046]. Further species specific enhancements are detailed within the Outline Landscape Management Plan oLEMP [APP-235]. In addition, the overall ecology strategy for the Project, set out in section 7 of the oLEMP, sets out a framework within which the ecological mitigation/enhancement can be provided. This is based on the requirements of the Oxfordshire Nature Recovery Network (ONRN) with a particular emphasis on the Evenlode Corridor through the Central Site Area and includes the provision of linkages through the site, including between the Dorn and Cherwell river valleys. The final layout will also include appropriate corridors throughout the Project site, primarily to ensure that bat movement is not compromised, but such corridors will also ensure foraging and permeability for many other species. The exact nature of these corridors, their size, location, management and planting, will be determined following further bat survey work currently being undertaken and which will be set out in a bat technical note and update to the oLEMP during the Examination.
	Aquatic environment.	We also have concerns that the aquatic environment, both in terms of habitat and species it supports, has been somewhat overlooked in the assessment and project design.	Given that all watercourses will be protected with appropriate buffers, as committed within the project's embedded mitigation [APP-046], during both construction, operation and decommissioning of the

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RR-0793-024	Environmental Statement- otter and water vole.	2.2 In our PEIR response we expressed concern about the lack of survey for otter and water vole; the Environmental Statement sets out the approach taken, indicating that there is no need to survey for water vole, as they are considered as a receptor by virtue of assessment of the effects on watercourses. Otters are considered as a receptor within the Environmental Statement (see paragraph 9.6.78 of Chapter 9 [APP-046]), but no survey has been undertaken to determine their presence or use of the watercourses. The Environmental Statement indicates that it is assumed that otter forage and commute within the project site, and that there may be holts along the river, but there has been no survey to confirm this (paragraph 9.9.195 of [APP-046]). It is recognised that short term disturbance to otter could occur due to noise and vibration during construction (paragraph 9.12.180 of [APP-046]); the assessment of the impact of such disturbance would be better informed if it were understood whether there were otter holts along the river as it passes through the project area. This needs to be considered in relation the protection otters receive under the Conservation of Habitats and Species Regulations 2017. Equally, noise and vibration during construction could disturb water vole, again this needs to be considered in relation to the protection water vole receive under the Wildlife and Countryside Act 1981. This is particularly relevant in terms of HDD crossings of watercourses but could also apply to the installation of solar panels in proximity to watercourses.	Project, impacts to the aquatic environment are not anticipated. Further, the delivery of the Evenlode Corridor will ensure a strategic, landscape-level enhancement with respect to the aquatic environment. Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity [APP-046], otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact. This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the

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			majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean <i>et al</i> 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run-off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced.
	Environmental Statement- Great Crested Newts (GCN)	2.3 It is noted that only a low population of GCN was recorded in 2 ponds outside the project boundary. Given the presence of low populations nearby, it would be beneficial to improve the habitat for GCN in the scheme area through biodiversity enhancements including provision of more ponds and connected terrestrial habitat.	The Project will require a licence to address potential effects to GCN populations on and around the site. At this stage, it is anticipated that the Project will use a Natural England mitigation licence for GCN and discussions with NE in respect of this are on-going. However, the Project may make use of the DLL, if that is more appropriate, as per commitment 9.13.

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		2.4 The oLEMP [APP-235] refers to use of a Natural England mitigation licence for GCN (paragraph 8.3.1), but elsewhere within the application, use of the District Level Licencing scheme is suggested (commitment number 9.13 of Table 9.8.1 of [APP-046]). Clarification is sought as to which approach will be taken forward. The County and Districts participate in the Nature Space District Licencing scheme which delivers a long-term, landscape scale conservation strategy for great crested newts, funded by development schemes, to mitigate and compensate impacts on great crested newts. To use the District Licence a requirement would need to be included within the DCO to link the consent to the District Licence; Oxfordshire County Council could authorise use of the licence if needed. We advise liaison with Nature Space with regards use of the District Licence for this scheme.	
RR-0793-025	Bats	2.5 The Bat Survey Report [APP-153] concluded that the assemblage of bats present is of at least national importance, that two Annex II bat species (barbastelle and Bechstein's) use woodlands adjacent to the site for roosting and that the mosaic of habitats within the Zone of Influence is of at least national importance. 2.6 The Environmental Statement concludes that the impact on the local bat population will be negligible on the basis that all landscape features that are used by foraging, commuting and roosting bats will be retained and protected by buffers (paragraphs 9.9.131 to 9.9.135 of [APP-046]). However, very little information has been presented regarding proposed avoidance or mitigation measures in relation to bats. Mention is made of provision of a suitable buffer to protect all important bat flightlines being incorporated into the 'detailed masterplan' (commitment 9.20 of Table 9.8.1 of [APP-046]). However, important bat	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the

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		flightlines are not identified in the Illustrative Masterplan [APP-062], or other documentation including the oLEMP [APP-235], outline Operational Management Plan (oOMP) [APP-234] or outline Code of Construction Practice [APP-232] and [APP-233]. What would be considered a 'suitable' buffer in terms of size has not been defined. 2.7 The Environmental Statement indicates that gaps to be created in hedgerows are mostly <5m and unlikely to cause change in foraging/commuting habitat (paragraph 9.9.132 of [APP-046]). However, again no information is presented in terms of which hedgerows are important bat flightlines to justify this conclusion. 2.8 It is noted that Table 1.1 (documents to support the implementation of the CoCP) of the outline Code of Construction Practice (oCoCP) [APP-232] includes a commitment to produce a construction artificial light emissions plan, however no specific link is made between this and particularly sensitive features for bats, or bat flightlines.	'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going. The lighting strategy during construction will be designed following best-practice guidelines with respect to avoidance of impacts to bats. This will include not lighting hedgerows etc.
RR-0793-026	Farmland birds.	2.9 The bird surveys [APP-158] and [APP-159] have identified significant numbers of breeding and wintering farmland birds; the breeding bird survey report indicates the breeding bird assemblage to be of County importance, although this is not correctly reflected in the Environmental Statement which assesses the assemblage as being of local importance only. 2.10 As raised in the PEIR response, there is some question as to how successful skylark plots can be within a solar farm. Skylark plots are not designed to provide nesting sites, but to open up the sward in agricultural settings to increase accessibility to invertebrate prey. Skylarks require long, unbroken sightlines; solar panels reduce the openness of the	Table 9.6.4 in ES Chapter 9 Ecology and Biodiversity [APP-046] sets out that the breeding bird assemblage is of County importance. This is carried through into the assessment of effects (e.g. section 9.9.90) and in the summary table 9.16.1. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark

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		landscape and therefore reduce the desirability of the area for nesting skylark due to perceived risk of predation. Post construction monitoring of over 100 solar farms in England and Wales found no evidence of nesting skylarks (In Practice, CIEEM Issue 117, Sept 22). 2.11 As previously suggested, we recommend development of a farmland bird strategy for the proposed development, which should consider the need for off-site measures as well as incorporating features for birds within the scheme. There are existing successful local schemes working with landowners on improving habitats for farmland birds, which might be able to support in this. We would welcome discussion with the developer on this and will set out further detail of how this would work in the LIR. 2.12 It is appreciated that areas left undeveloped due to archaeological interest will be used to provide wildflower areas for the benefit of a range of species, however these areas are not large enough to provide sufficient scope for nesting skylarks to offset the areas lost.	territories. Skylark plots also benefit other farmland bird species. The Project site will be managed through conservation grazing to create grasslands of varied diversity and structure. Recent research on the impact of solar farms on farmland birds (Copping <i>et al</i>/ 2025) found that solar managed for mixed habitats (either ungrazed or grazing with an allowance for wildflowers to set seed, woody hedgerow features) had significantly higher numbers of both farmland birds and bird species than an intensive arable baseline. Given that, as set out in the oLEMP [APP-235], the Project will be managed via conservation grazing with pauses in the grazing over the summer to allow plants to flower and set seed, it is anticipated that the Project will provide an overall enhancement for the bird assemblage present.
	Operational impacts on wetland birds and aquatic invertebrates.	2.13 No assessment has been provided of the potential effects during operation of the solar farm on wetland birds and aquatic invertebrates, despite this having been raised in our EIA scoping consultation response. The Zone of Influence for the assessment should take this into account, particularly given the proximity of large waterbodies of value to birds in the wider area, including Farmoor Reservoir, Cassington Gravel Pits, Blenheim lakes, and in the wider area, Otmoor and the Lower Windrush Valley complex. An understanding of the use of the wider landscape by wetland birds and	Operational impacts on all breeding and wintering birds, and invertebrates identified within the Botley West Solar Farm have been assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [APP-046]. Although the lake effect has been hypothesised as a possibility, a review of the impact of solar farms on birds by Natural England (2017)

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		aquatic invertebrates is needed to assess how the solar panels might influence behaviour of these species (evidence suggests that the polarised light of solar panels can be confused by these species for open water) and consequent impacts on their populations through mortality or reduced breeding success.	concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. Research in the United States found some evidence that such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations and no evidence has been published demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping <i>et al.</i> 2025).
RR-0793-027	Biodiversity Net Gain.	2.14 We welcome the commitment to deliver biodiversity net gain above the minimum mandatory requirement of 10% due to come into force in November 2025. We note that the statutory metric has been used to calculate biodiversity net gain in line with the recommendations in Section 4.6 of EN-1, reporting a predicted 80.80% net gain in habitat units and 57.93% net gain in hedgerow units. It is notable that no calculation has been made of baseline or post development watercourse units. According to the Statutory Metric User Guide, if the site boundary crosses into the riparian zone (as is the case for this scheme), all adjacent lengths of watercourses should be included in the watercourse module. It is noted that no delay in starting habitat creation has been included within the temporal multiplier for the metric, although it is understood that the construction period is two years.	Following discussions with Natural England, the watercourse section of the metric will be included in the BNG Assessment, following River Morph surveys. Although the total construction period is anticipated to be two years, as a staged approach to work areas will be undertaken (excluding temporary compounds), it is considered that the majority of the site will be constructed in less than one year from construction, as such the Project does not require temporal multipliers to be entered. This will be developed once further details of construction methodologies and timings become available.

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		Clarification is sought as to whether there will be any delays in habitat creation.	
RR-0793-028	Local Nature Recovery Strategy	2.15 The Biodiversity Net Gain Assessment [APP-162] references (on pages 3 and 6) the Oxfordshire draft Nature Recovery Network in designing biodiversity net gain and calculating strategic significance. It should be noted that OCC, as Responsible Authority, is leading a partnership process to develop the Local Nature Recovery Strategy (LNRS) for Oxfordshire as mandated by the Environment Act 2021. The LNRS will be critical in delivering government targets for species abundance and habitat creation commitments, as well as wider environmental outcomes. The draft Oxfordshire LNRS was subject to public consultation in October 2024 and the draft documents are available on our consultation pages. We are aiming to publish the final Oxfordshire LNRS in Autumn 2025. 2.16 The aim of the Applicant's scheme, to establish a landscape-scale wetland corridor along the River Evenode (see page 6 of [APP-162]), is welcomed, and aligns with the priorities and mapping in Oxfordshire's emerging LNRS. 2.17 It is noted that hedgerow planting is planned to provide connectivity between Tackley Wood and the Blenheim Estate, Bladon and Burleigh Woods. While this is welcomed, we would suggest that the potential to use hedgerow and woodland buffers for wood-pasture creation or natural woodland regeneration in this area is explored to provide greater woodland connectivity, aligning with mapped measures in the emerging LNRS, and supporting the important bat populations identified through the surveys. 2.18 The species surveys flagged the presence of some very rare/under-recorded species for the County,	Noted re the broad alignment between the Ecology Strategy for the Project and the emerging LNRS. The Project has committed to providing appropriate buffers along key flightlines for bats (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). The nature of the buffers with respect to management and habitat creation will be set out in more detail in the bat technical note to be published. However, it is intended that such buffers support the connectivity for bats and other wildlife between the ancient woodland blocks and ensure that the overall permeability of the landscape remains post development.

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		notably the Bechstein and barbastelle bats at Bladon Heath, but the presence of nightingale and dormice is also significant with both species recorded in very low numbers in Oxfordshire. Identification of habitat creation measures specifically aimed at supporting these species would be welcomed.	
RR-0793-029	Wider Environmental Benefits	2.19 Paragraph 4.6.15 of EN-1 states that “applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wide environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design...” It is not immediately apparent that such a statement has been submitted with the application. Some information on wider environmental benefits is included with the draft Oxfordshire LNRS documents, and we are seeking to reflect this further in the Local Habitat Map prior to publication. Work undertaken by Oxford University has mapped natural capital baselines and natural capital opportunities across Oxfordshire and would provide a good starting point for considering priorities for delivery of wider environmental benefits through the scheme.	The benefits of the Project with respect to ecology are set out in Section 7 Ecology Strategy of the oLEMP [APP-235] . This defines the ecological vision for the Project and is based on incorporating the aims of the Oxfordshire Nature Recovery Network, the forerunner of the emerging Oxfordshire LNRS.
RR-0793-031	OLEMP lifespan.	2.21 Paragraph 5.4.44 of EN-1 5.4.44 states that “any habitat creation or enhancement delivered ... for compensation or biodiversity net gain should generally be maintained for a minimum of 30 years or for the lifetime of the project, if longer”. The oLEMP [APP-235] mentions monitoring for 30 years (paragraph 15.1.5), but elsewhere references monitoring for the lifetime of the project (paragraphs 1.1.10 and 17.1.1). Clarification and correction of the documents is therefore suggested to confirm that management, and monitoring should be undertaken for the lifetime of the project as a minimum. We would	The Project site will be managed and maintained for the lifetime of the Project, as set out in paragraphs 1.1.10 and 17.1.1 of the oLEMP. The reference to 30 years is in respect of the minimum commitment for the maintenance of features for Biodiversity Net Gain purposes. However, this will be clarified in the next iteration of the oLEMP.

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		encourage the ongoing management of habitats created for compensation and biodiversity net gain beyond the life of the project.	
	OLEMP council funding.	2.22 It is set out that the intention is for multiple LEMPs (covering different zones of the scheme) to be approved by Districts prior to commencement. While this is a matter for the Districts, OCC considers it is essential the Districts are adequately resourced and funded to do this. The same point applies to any requirement which must be discharged by a local authority.	The discharge of Requirements is a statutory function of the host authorities and, as such, it is not the role of the Applicant to fund this. However, the Applicant has had a Planning Performance Agreement (PPA) with the host authorities to cover their input of the Project to submission and are in the process of agreeing one to cover input to the Examination. They may, therefore, look to extend this to cover post consent Requirement discharge etc.
	Invertebrate enhancements.	2.23 The oLEMP [APP-235] refers to provision of bee hives (paragraph 10.2 (River Evenlode Corridor), fourth bullet; paragraph 10.2 (Wildflower Meadow Grasslands), third bullet; paragraph 10.2 (Woodlands), final bullet; and paragraph 11.8.1); we would question whether this is an appropriate measure for biodiversity benefit. Honeybees are not native to the UK, and would potentially compete with native pollinators (such as bumble bees, solitary bees, butterflies and hoverflies) for nectar sources. However, the diagram of the 'bee hive' provided in Appendix A (figure 4) to the oLEMP would be better described as a 'insect hotel' than a bee hive. Clarification is therefore sought as to what the proposed provision is for pollinators. A more appropriate measure to support declining native pollinator species would be to include specific planting for pollinators in edge habitats, similar to measures to provide nectar species under Countryside Stewardship.	The bee hives will be in accordance with those identified in Appendix A of the OLEMP [APP-235] , providing habitat for native invertebrate species. Project edges containing meadow grassland with wildflowers for invertebrates are outlined in the OLEMP [APP-235] .

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7. Public Right of Way			
RR-0793-033	PRoW	The scale and location of this development and the impact on local land use, landscape attractiveness, access and amenity for local residents, the countryside 'feel' of the area and PRoW users across the area is significant and unprecedented. The impacts will be felt during construction as well as in the operational period. By enclosing many PRoW with fencing and constructing large fields of solar panels and supporting large infrastructure, it needs to be understood that the feel of the local environment from the paths, and the quality of the paths themselves, will be significantly affected. Through appropriate mitigation and amendments to the design, the development needs to ensure that, both onsite and offsite, people still feel a connection to the countryside and can enjoy a countryside experience when using PRoW for active travel, leisure and recreational journeys.	The potential impacts of the Project upon all sensitive Landscape and Visual Resources and receptors, within the 5 km study area, including the available views from local Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3]. Project Impacts will be mitigated against by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, and in many locations a much wider provision is made, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerow would be managed to an appropriate height (3m to 4m) which over time would help to screen some available views to the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured, however, due to the undulating nature of the topography in the local area it would not be possible to entirely screen the Project. However, there would be no location along the public rights of way network where a visual appreciation of the whole Project would be possible. Rather, there would be intermittent, transitory views to parts of it. The effect is therefore lessened.
		A comprehensive package of onsite measures and offsite mitigation is required to minimise negative impacts and to mitigate the changes in the local landscape and environment before construction	Notwithstanding, the Applicant has aimed to avoid impacts on the PRoW network through project design and trenchless techniques, preventing the need for stopping up or diversion of routes. Where avoidance

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		commences, during construction and operation, and in the decommissioning and reversion phases when the additional public access provision must not be lost.	is not possible, management measures are proposed in the Outline PRoW Management Strategy (Annex B of the Outline Code of Construction Practice [APP-232]), secured under Requirement 11 of the Draft DCO [AS-009]. Any proposals to change or enhance PRoW as part of the Project, such as new greenway proposed in the Outline Landscape and Ecology Management Plan [APP-235], will adhere to the requirements of the Highways Act (1980), where applicable, in addition to the requirements of the PRoW Management Strategy, which will be prepared and approved by local authorities post-consent. As stated in paragraph 1.5.25 of Outline PRoW Management Strategy (Annex B of the Outline Code of Construction Practice [APP-232]), surfaces directly affected during construction of the Project and temporary diversion routes would be reinstated to a suitable condition post construction in accordance with the detailed PRoW Management Strategy (post consent).
		All PRoW across the sites that pass through/adjacent to solar fields need to be provided as landscaped 'greenway' PRoW – with a minimum 15m overall 'corridor' width (additional width to be dedicated), access for small PRoW maintenance vehicles, planted with an appropriate non[1]injurious/thorny hedge, shrub & tree planting palette. The reason for this provision is so the visual impact and proximity of	Any proposals to change or enhance PRoW as part of the Project, such as new greenway proposed in the Outline Landscape and Ecology Management Plan [APP-235], will adhere to the requirements of the Highways Act (1980), where applicable, in addition to the requirements of the PRoW Management Strategy, which will be prepared and approved by local authorities post-consent.

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		fencing and built infrastructure is softened whilst still providing wide, clear and accessible paths for people. All fenced-in PRow need to be stone surfaced to 3m width with 3-4m clear grass verges each side of this, with graded landscaped edges between the path and the fencing. The full width of the PRow needs to be dedicated as PRow to ensure permanent protection.	
		Some PRow on each of the sites need connecting up within the site where possible to provide a high quality, coherent and connected network with high quality path provision, good signing and accessible infrastructure (gates, seating, water crossings etc). We would welcome discussion with the developer on this and will set out further detail in the LIR.	The Applicant will continue discussions with OCC following the issue of the LIR.
		The development should provide a range of bridleway PRow to provide alternative routes, to reduce the need to use roads and to increase user safety. These should be provided onsite by the developer, provided within the landownership/control boundary (blue line boundary) by the developer/landowner. Other offsite mitigation should take the form of a financial contribution for offsite mitigation undertaken by the Countryside Access Strategy Team at Oxfordshire County Council. This team negotiates and agrees this kind of project with third-party landowners and farmers and undertakes project delivery through private contractors. The scale of this contribution will depend on what onsite/in-control mitigation is agreed.	The Applicant will continue discussions with OCC regarding this matter.
		PRow crossed by underground HV and other cables, ditches and ducts etc need to be disturbed as little as possible, if at all. Pipes and cables should be horizontally dug/bored so that the PRow isn't disturbed. Where this isn't possible, disturbance must	The Applicant has aimed to avoid impacts on the PRow network through project design and trenchless techniques, preventing the need for stopping up or diversion of routes. Where avoidance is not possible, management measures are proposed in the Outline

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		be kept to a minimum and the safety of users maximised. This could be achieved by excavating each side of the PRow and only excavating the PRow just prior to duct work or the cable being laid. The ditch must not be left open/exposed and should be filled in, compacted/consolidated and path made good immediately after cables laid, in order to reduce disturbance to the path and user. No use of PRow for development purposes other than if essential as a crossing point between fields. All vehicle crossing points to be monitored when active. Crossing point PRow must be protected from HGV by weight spreading mats, appropriate stone reinforcement, and making good within 24 hours.	PRow Management Strategy (Annex B of the Outline Code of Construction Practice [APP-232]), secured under Requirement 11 of the Draft DCO [AS-009].
RR-0793-035	Site Specific PRow	Onsite mitigation: These measures are set out in the maps below. They are in addition to, and may also duplicate, the general points of principle included above and in the offsite measures below. They are not exclusive and OCC Countryside Access Strategy would welcome the opportunity to survey all areas and paths to further refine requirements. Offsite mitigation: A contribution is considered reasonable to secure off-site and out-of-ownership improvements to mitigate the loss of visual amenity and to provide alternatives or extensions of routes in the locality and impact area up to 3km from the boundary of the sites. 3km is considered reasonable to enable the assessment and improvement of key routes in the local area. It will not mean all PoW in that 3km, just those that enable more user choice about whether or not to pass through the altered landscape of the solar park scheme	The Applicant notes these proposals and will continue to engage with OCC regarding the PRow network and site-specific measures.

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		The Consultation Report [APP-024] In OCC's consultation responses, we emphasised the importance of PRow to the public and the concern that the solar farm will have a negative impact on these. The Consultation Report [APP-024] states 'the Applicant intends to retain all existing PRow throughout the Project area' (page 43), these PRow will exist in a different context because of the solar farm and the 'countryside feel' that people often seek for leisure and health benefits will be irreversibly changed.	We acknowledge that there are concerns regarding how the potential impacts of the Project on the setting and use of the public right of way (PRow) network may influence health and wellbeing. These impacts have been assessed in the ES. The primary analysis of landscape effects is set out in Volume 1, Chapter 18: Landscape and Visual Impact Assessment (LVIA) of the Environmental Statement (ES) [APP-045] and the primary analysis of PRow effects are set out in Volume 1, Chapter 17: Agricultural Land Use and PRow [APP-054]. Volume 1, Chapter 16: Human Health [APP-053] uses these inputs to explain the public health implications. Additional supporting analysis is set out in Volume 3 Appendix 16.4: Human Health Public Rights of Way Analysis [APP-222]. Chapter 16 section 16.9 (Open space, leisure and play) [APP-053] assesses population health outcomes associated with changes in open space and recreation. The existing PRow context includes routes that have high hedging on both sides, as well as stretches with more open views. For the health assessment the relevant outcomes relate to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. This means that some stretches would have additional and higher hedges that reduce wider landscape views. The balance of providing appropriate screening has been carefully considered alongside other features to maintain route amenity as set out in the Outline Landscape and Ecology Management Plan [APP-235]. The Chapter 16 assessment [APP-053] discusses how particular consideration has been given to creating greenways (with width, hedges, trees and

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			trail/signage) that promote to the quality of the physical activity opportunity, and thus the use of the routes that connect the area's villages. The greenways are discussed and illustrated in the Outline Landscape and Ecology Management Plan [APP-235] section 6 and Figures 7.6.3.2 A-M. The Chapter 16 assessment [APP-053] has been transparent in articulating potential impacts and their potential to affect behavioural change at a population level. The character of parts of the PRow network would change, however the health assessment explains where these changes would be and what approximate durations and alternatives are available for PRow users. The assessment appropriately focuses on the key routes connecting communities and areas where the views are most affected by passing through the solar arrays. Chapter 16 identifies the potential for one short-term significant adverse effect in relation to use of the PRow network at the start of the operational phase. This effect relates to the potential for behavioural change by a minority of people in the communities close to the project. The effect is driven by actual views of the arrays from PRow whilst planting matures and also wider public understanding of the project, which we recognise as affecting decisions to use the PRow irrespective of the actual visual change. The new planting is the key measure that addresses this significant effect, see the Outline Landscape and Ecology Management Plan [APP-235]. In addition to the maturing of the new greenway sections, it is also relevant (and discussed in Chapter 16) that in most cases alternative PRow sections exist between communities of similar travel time and which benefit from high degrees of existing screening. The

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			behavioural change is therefore likely to include adopting of alternative routes not simply forgoing of use of the PRoW network. Information boards and signage would be provided to encourage use of the routes. Monitoring is proposed to confirm outcomes and provide additional route promotions if required. Other measures include a new route connecting Church Hanborough and Cassington to enhance the PRoW network. Other potentially adverse effects of the project are also assessed by Chapter 16 [APP-053], including PRoW effects during the construction phase, and it is concluded that none would give rise to significant adverse population health effects, including for vulnerable groups. Public health mitigation measures are set out in Chapter 16 Table 16.23 [APP-053]. Mitigation planting is described in Volume 1, Chapter 12: Landscape and Visual Impact Assessment (LVIA) [APP-045] and in the Outline Landscape and Ecology Management Plan [APP-235], which sets out measures to integrate the Project into the landscape. An Outline Public Rights of Way Management Plan is set out in the Outline Code of Construction Practice [APP-232], which sets out measures to promote use of the PRoW network. The Outline Operational Management Plan [APP-234] Table 3.1 sets out Human Health specific mitigation, including for the periodic monitoring of use of PRoWs. The Chapter 16 assessment [APP-053] has carefully considered the context and the relevant public health impacts to support an appropriate mitigation package for the specific issue of PRoW use. More broadly, Chapter 16 recognises that the Project would bring

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			significant renewable energy security benefits, experienced locally as well as nationally, which would have a protective effect on public health (paragraph 16.9.239 [APP-053]).
		The Consultation Report [APP-024] states: that the "Applicant is looking at ways the Project can improve the PRowWs in the area" (page 43), and that the Project is contributing to "securing new recreational routes, including permissive paths, cycleways and Green Ways, to mitigate potential adverse effects on public health associated with changes in the use of the PRow network" (page 125). Whilst some improvements have been proposed and are welcomed, these are limited and do not go far enough in delivering community benefits on the scale the solar farm is impacting. OCC therefore seek further improvements to address this.	The Applicant will continue discussions with OCC regarding this matter.
RR-0793-036		<i>Financial Contribution</i> 3.9 As mentioned, OCC seeks a financial contribution of £350,000 (Baxter indexed from April 2024 with a 10 year longstop) in respect of improvements to the PRow network. OCC would welcome discussions with the Applicant in respect of the request as soon as possible. Maps showing PRow on site and off site improvements required; • Black lines - required new PRow links offsite • Red lines - upgrades of existing PRow condition which may include upgrades from footpath to bridleway or cyclepath (Illustrative Masterplan 01 - 08)	The Applicant notes these proposals and will continue discussions with OCC regarding this matter.
RR-0793-037		Estimated contribution breakdown* Site and habitat surveys & assessments 5% Landowner negotiations and agreement payments 5-10%	The Applicant notes these proposals and will continue discussions with OCC regarding this matter.

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		Outline/high-level design allowance 5% Admin processes e.g. consultation, project management <5% Legal processes e.g. temporary works closures, creation agreements and contracts 5% Detailed design/ Walk&Talk/ Early Contractor Involvement 5% Materials, plant & equipment 60%+ Contingency/Risk and ongoing quality standard retention 10-20% *All allocations are estimates. Any contribution would be aggregated across routes and activities and a longstop of 10 years will be requested. Active Travel 3.10 Many of the PRoWs through the sites form part of strategic walking and cycling connections across Oxfordshire, as identified in Oxfordshire's Strategic Active Travel Network (SATN) and Local Cycling and Walking Infrastructure Plans (LCWIP) (see: OCC Active travel) – the development of these is a key priority for OCC and are tied in with the goals of the Local Connectivity and Transport Plan which seeks to reduce 1 in 4 car trips by 2030 and deliver a net zero transport network by 2040.	
RR-0793-038		Proposed and Additional Suggested Active Travel Improvements Wootton to National Cycle Route 5 While OCC welcome the Applicant's proposed walking and cycling route, which is indicated by the blue dotted line, on Figure 1 below, we consider it should be surfaced so that it is appropriate for walking, cycling and horse riding (e.g. by using compact gravel) and request that the Applicant confirms that these this will be done. In addition, the Applicant should provide the linking bridleway between 416/20/10 and 416/2/50,	The Applicant notes these proposals and will continue discussions with OCC regarding this matter

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		indicated by the black line on Figure 1, also using compact gravel or similar. This will enable safe and continuous connectivity between the public rights of way within the site and ensure the countryside can still be accessed and enjoyed.	
RR-0793-039		Bladon to Begbroke walking and cycling route A track from Bladon to Begbroke across the site' is proposed and this is welcomed (being also identified in the Woodstock LCWIP and OCC's SATN). For the improvements to have strategic benefit OCC require walking and cycling to be permitted. Therefore, a change from footpath to cycle track is sought. Furthermore, the current depiction of this track (indicated by the blue line in Figure 2) – which is labelled a cycle path on plans (but recorded as footpaths 132/2/10 and 265/26/10), does not connect to Bladon or Begbroke. Currently the proposed cycle path connects to a footpath 124/12/10 before joining the A44, so continuous cycling is not possible along this route. OCC seek the Applicant to deliver a cycle path through their site from Begbroke to Langford Lane (a key employment and residential gateway). We seek further discussion with the Applicant regarding the opportunities for cycle paths shown by black dashes in Figure 2. This path should be surfaced with flexipaving or similar.	The Applicant notes these proposals and will continue discussions with OCC regarding this matter
RR-0793-040		Strategic walking and cycling connections As set out in the PEIR response, OCC have two planned strategic walking and cycling improvement schemes that interact with the solar farm. One such scheme is a connection between Eynsham and Hanborough, which forms part of OCC's Strategic Active Travel Network (SATN). OCC are pursuing two	The Applicant notes these proposals and will continue discussions with OCC regarding this matter. With specific regard to the request that the Applicant should deliver the proposed route between Eynsham and Hanborough via Lower Road and the planned B4044 Eynsham to Botley cycle route, this has been discussed with OCC in which the Applicant advised

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		routes between Eynsham and Hanborough – a PRow route that crosses the solar farm site (shorter-term ambition) and a route adjacent to Lower Road (longer-term ambition). OCC request that the Applicant convert the section of PRow through their site (known as footpath 238/5/20), circled in red in Figure 3, to a bridleway with compacted stone surface to seamlessly connect into other PRow improvements suggested by OCC. This will contribute to OCC's planned PRow connection between Eynsham and Hanborough and compensate current and future residents and visitors of the area for the negative impact on the landscape and 'countryside feel' the solar farm will have. In addition, OCC request that land along the western and eastern verges of Lower Road be safeguarded for future development of a walking and cycling route. The proposed route between Eynsham and Hanborough via Lower Road links in with the planned B4044 Eynsham to Botley cycle route. Both routes in part overlap with the proposed cable route for the solar farm. The Applicant has not finalised details of the cable laying, but if trenches are dug along the planned routes, a requirement of the DCO should be to agree details of their reinstatement to ensure compatibility with the future cycle path construction. Notwithstanding this, OCC are of the view that the two cycle schemes should be delivered by the applicant as a community benefit (separate to the annual Community Benefit fund and discounted electricity scheme). Given the scale and impacts of the solar development, delivery of the cycle schemes would provide a much needed and visible benefit to the community at an appropriate scale.	OCC that it was not a reasonable requirement for the Applicant to deliver these. In those discussions, the Applicant asked OCC to explain why they thought the delivery of these schemes was reasonable, proportionate and relevant to the Proposed Development, to which a response from OCC is currently awaited.

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8. Traffic Transport and Access			
RR-0793-032	Oxfordshire County Council	Key Issues i. The proposal does not adequately consider the impacts of the development on users of the PRoW network. ii. Suggested PRoW mitigation measures and improvements to the scheme have not been carried forward. iii. OCC would welcome discussions on the Applicant's proposed highways powers, as set out in the draft DCO which, in their current form, are too wide ranging. iv. For the above reasons the application cannot at this stage be supported from a transport perspective. v. The suggested improvements and financial contributions set out below are required to make the development acceptable. vi. OCC considers a legal agreement is required to secure the following: Contribution - Variation to Traffic Regulation Order* - Speed Limit Signs - Public Rights of Way Amount £ - £4,224 - £5,000 - £350,000 Price base - April 2025 (TRO fee increases as of April 2025) - April 2024 - April 2024 Index - RPIX - Baxter - Baxter Towards (details) - Permanent reduction of speed limit on B4017 from 60mph to 40mph - 20 new speed limit signs and poles on B4017 (10 each direction) - Improvements to the Public Rights of Way network within 3km from site boundary	The Applicant notes this helpful summary and provides a response to these within the detailed comments and responses.

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		*Required if DCO cannot provide a permanent change in speed limit.	
RR-0793-041	Oxfordshire County Council	3.17 The B4017 between Farmoor and Cumnor is indicated as the route of underground cables and the access for a construction compound serving the solar farm. This is a proposed strategic route within Oxfordshire's SATN. Additional heavy goods vehicles on this route caused by the solar farm will pose a road safety risk for people cycling on this road. Accordingly, the Applicant proposes a speed limit change within Part 1 of Schedule 8 to the draft DCO – "B4017 Cumnor Road between a point 83 metres to the south of Farmoor Court and a point 170 metres to the north of Leys Road as shown on sheets 12 and 13 of the traffic regulation measures plans". In the location mentioned above, Part 1 proposes a "temporary change in speed limit to 40 miles per hour". OCC would want this as a permanent change to the speed limit and seek £5,000 (index linked) for the erection of signage to support the speed limit change. Costs for a Traffic Regulation Order variation are set out in the fee schedule in case this is required for a permanent change in speed limit.	The Applicant welcomes Oxfordshire County Council's costings relating to the changes to Traffic Regulation Orders and the erection of associated signage. The Applicant will continue discussions with Oxfordshire County Council regarding the most appropriate means of securing these contributions.
RR-0793-042	Oxfordshire County Council	Comments on ES Chapter 12: Traffic and Transport [APP-049] 3.18 Proposed alterations to the highway will need to consider all users in line with LTCP policy 1 – Transport User Hierarchy and 15 – Vision Zero to ensure the most vulnerable road users are prioritised. This would include such proposals highlighted in paragraph 12.7.18 – B4044 Eynsham Road/B4017 Cumnor Road and paragraph 12.7.18 – Widening works on Cumnor Road,	The proposals at the B4044 Eynsham Road/B4017 Cumnor Road junction, along Cumnor Road, at the B4027 / Banbury Road junction and at the Burleigh Road /Yarnton Road junction as set out in paragraph 12.7.18 of ES Volume 1, Chapter 12 [APP-049] and at Appendix 12.8 Accesses and highway drawings Part 4 of 4 [APP-209] have taken account of LTCP policy 1 – Transport User Hierarchy and policy 15 – Vision Zero to ensure the most vulnerable road users are prioritised. Pedestrian facilities at these locations are unaffected whilst there would be improvement to

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		B4027 / Banbury Road, Burleigh Road /Yarnton Road junction of [APP-049]. 3.19 Additional highway alterations required as part of the development should align with LTCP Transport User Hierarchy and support policy 1 and policy 15 of LTCP. 3.20 All HGV and AIL movements should align with LTCP policy 15 to support OCC's Vision Zero Action Plan which states an ambition to have zero road fatalities or serious injuries on Oxfordshire's transport system by 2050. 3.21 Paragraphs 12.7.13 – 12.7.16 of [APP-049] concern the origin of construction staff movements. OCC considers a policy must be put in place to restrict movements on rural roads to reduce the possibility of rat running. 3.22 PROW throughout the site should be protected, maintained or mitigations sought in line with LTCP policy 5. 3.23 Paragraph 2.10.143 of NPS EN-3 states OCC will need to liaise with the Applicant relating to the start of construction and broad timings of deliveries. We support this in line with LTCP policy 1, 15 and 47 to ensure conflicts between transport users is minimised. 3.24 Table 12.6 (issues considered within this assessment; page 31 of [APP-049]) –mitigation must be agreed to ensure the impact on walking, cycling, wheeling and public transport routes is minimised during construction phases. Any changes in travel behaviour may adversely affect OCC's ambition stated in LTCP to replace/remove 1 in 4 car trips and increase the number of cycle trips in Oxfordshire from 600,000 to 1 million by 2030.	the turning and safe movement of vehicles thus offering highway safety improvements to all road users including cyclists and the transport user hierarchy set out in the LTCP. Similarly, the access designs set out in Appendix 12.8 Accesses and highway drawings Parts 1 to 4 [APP-206 to APP-209] and Site Construction Compound Accesses [APP-226] have been prepared in accordance with highway design standards and take due regard to non-motorised user provisions and movement in accordance with the transport user hierarchy set out in the LTCP. All HGV and Abnormal Indivisible Load (AIL) movements will be in accordance with the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [APP-232] and is secured at Schedule 13 of the Development Consent Order [APP-015]. Paragraph 1.1.8 of the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 [APP-232] sets out that the purpose of the OCTMP is to set out how the numbers and routeing of HGVs will be managed during the construction phase and sets out the details of measures to manage the safe passage of HGV traffic via the local highway network, details of localised road improvements if and where these may be necessary and measures and processes relating to AILs to facilitate safe use of the existing local highway network. Thus, the movements of HGVs and AILs align with LTCP policy 15 to support OCC's Vision Zero Action Plan which states an ambition to have zero road fatalities or serious injuries on Oxfordshire's transport system by 2050.

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		3.25 Any risk of conflict between HGVs and AILs and vulnerable road users should be mitigated to support LTCP policy 1, 2 and 15.	With the measures set out within the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 [APP-232], risks of conflict between HGVs and AILs and vulnerable road users would be mitigated to support LTCP policy 1, 2 and 15. The movement of construction staff is controlled at Section 1.5 of the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 [APP-232] and is secured at Schedule 13 of the Development Consent Order [APP-015]. This sets out that the Principal Contractor will be responsible for providing a minibus service to pick up / drop off all construction staff to / from identified locations such as park and ride sites, public transport hubs etc. Thus, the movement of construction staff will be controlled such that it restricts movements on rural roads to reduce the possibility of rat running. With regards to Paragraph 2.10.143 of NPS EN-3, the Applicant welcomes Oxfordshire County Council's recognition and confirms it is in ongoing dialogue with Oxfordshire County Council in progressing a Statement of Common Ground accordingly. With regards to mitigation and Table 12.6 of ES Volume 1, Chapter 12 [APP-049] (issues considered within this assessment), the Applicant welcomes Oxfordshire County Council's recognition and confirms it is in ongoing dialogue with Oxfordshire County Council in progressing a Statement of Common Ground accordingly.
9. Trees Plants and Flora			
RR-0793-008	Arboricultural Impacts.	Following review of the application, no additional arboricultural information appears to have been submitted since the previous consultations. In the	High quality and significant features have been assessed, including ancient woodland and veteran trees.

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		absence of the additional information requested, the application cannot be supported in arboricultural terms.	The design of the solar scheme has sought to counteract the need for a full survey of ALL trees, by providing consistent buffers to hedgerows and tree groups across the proposals. Therefore, by-design, tree protection is part of the solar schemes design standard. Further arboricultural information will be produced following consent and once detailed crossing locations, cable and service designs are available. This will give a greater level of detail about the possible impacts upon trees, allowing focused surveys to be tasked. This scale of survey is proportionate to the likely possible impact upon trees and woodlands.
RR-0793-018	Impacts on mature vegetation.	1.7 As outlined previously the cable trenches and access points have the potential to cause the loss of existing characteristic vegetation including mature trees and hedgerows. Such losses have the potential to significantly affect local character and views not only during construction but also in the long-term as mature vegetation cannot be readily replaced by new planting. 1.8 EN-3 states in para 2.10.101 "The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate". Impacts on vegetation are proposed to be addressed through Strategic Arboricultural Impact Assessment and Method Statement, however, OCC's arboricultural officer considers this provides insufficient detail with regard to the retention and removal of trees and hedgerows to allow a judgement on related impacts.	The retention of trees and hedgerows will be a priority during detailed design, especially when determining potential cable routes and access points which will be micro-sited and designed in detailed upon consent. Where possible existing access points will be utilised, and any trenching will be located outside of tree and hedge RPAs. If the proposed scheme does need to cross through any tree groups or hedgerows, the 'Path of least resistance' will be used in order to maximise tree and hedgerow retention. Due to the nature of solar farm construction, the majority of the proposed scheme will have a low impact on the trees and hedgerows within the scheme, with tree and hedgerow removal likely to be

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		1.9 It is important that vegetation removal is understood and properly mitigated, with processes put in place to ensure any vegetation loss is agreed with the relevant parties prior to any works being carried out. This should clearly relate to hedgerow removal plans and Arboricultural Impact Assessment, and this must also include vegetation removal or works to facilitate wider highways and access works.	relatively minimal. Further information will, however, be provided, on tree retention and removal, during the detailed design phase. Following detailed design, the full impact of the proposed scheme will be assessed, and this information will be used to inform suitable mitigation planting. This information will be given to the relevant parties prior to works being carried out.
RR-0793-044	Arboricultural Comments	4.1 Following review of the application, no additional arboricultural information, which was requested following the Statutory Consultation, appears to have been submitted. Therefore, our previous arboricultural comments in OCC's responses dated 8 February 2024, 9 August 2024 and 12 September 2024 are still relevant and the further detailed arboricultural information previously requested is required to address the comments. These comments are reproduced below our arboricultural comments on the draft DCO. In the absence of the additional information requested, the application cannot be supported in arboricultural terms. Draft Development Consent Order 4.2 Article 38(6) (felling or lopping of trees and removal of hedgerows of the draft development consent order) [AS-009] states the undertaker may not "fell or lop a tree or remove hedgerows within the extent of the publicly maintainable highway without the prior consent of the highway authority". 4.3 OCC support this and consider it essential that written consent must be given by the Highway Authority before any works are carried out, including pruning, felling or works to tree or hedgerow roots, in	High quality and significant features have been assessed, including ancient woodland and veteran trees. Further arboricultural information will be produced following consent and once detailed cable and service designs are available. This will give a greater level of detail about the possible impacts upon trees, allowing focused surveys to be tasked. Following detailed design, once the crossing locations and cable route(s) is set and the nature of any removals works is known, this information will be shared with the Highway authority and consent will be sought. The scheme will seek to retain and protect any trees with Tree preservation orders, however, any trees with Tree Preservation Orders that require works, will be identified and listed within future arboricultural reports following detailed design.

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		relation to vegetation in the publicly maintainable highway. 4.4 With regards to article 39 (trees subject to tree preservation orders), OCC will await the comments from the District Council Tree Officers before commenting further.	Under Article 38(6) of the draft DCO, consent is required from the highway authority before felling or lopping trees or removing hedgerows within a publicly maintainable highway without the prior consent of the highway authority.
RR-0793-045	Previous arboricultural comments in OCC's responses dated 8 February 2024, 9 August 2024 and 12 September 2024.	Oxfordshire County Council's response to Botley West Solar Farm targeted consultation (15th August to 15th September 2024) on single Order limit change within the Central Site to accommodate cable routing around a veteran tree – 12th September 2024 Thank you for consulting Oxfordshire County Council (OCC) on the above consultation. All matters raised in OCC's previous consultation responses continue to apply. As advised previously, with regard to arboricultural matters insufficient information has been submitted to date and more detailed arboricultural information including tree surveys and arboricultural impact assessments is required before detailed assessments can be made by OCC. Specifically in relation to the above proposed change, as no tree survey or arboricultural impact assessment has been submitted in relation to this, it has not been possible to determine accurately the impact that the proposal will have on the adjacent veteran tree. As a result, it has not been possible to assess the impact that this change would have in relation to compliance with Forestry Commission and Natural England standing advice in relation to veteran trees shown below and section 186 of the NPPF. The consultation material states that the previous proposals had assumed the underground cable would be installed beneath the	High quality and significant features have been assessed, including ancient woodland and veteran trees. Further arboricultural information will be produced following consent and once detailed cable and service designs are available. This will give a greater level of detail about the possible impacts upon trees, allowing focused surveys to be tasked. A "Veteran Tree Survey" has been carried out and submitted in order to inform detailed design so that they can be identified and protected. Further assessment of the impact the proposal will have upon these trees will be supplied following detailed design when more details of the cable route are known. NPPF 186: refers to coastal developments but it is assumed that OCC was referring to NPPF Section 193 c) 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;'

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		veteran tree; this would be contrary to the standing advice and NPPF section 186 and cannot be supported. Standing Advice: 'For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area' (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-andveteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigateimpacts-and-compensate-as-a-last-resort). The proposed change may also affect the ancient woodland to the north and the impacts on this woodland should also be assessed. The Applicant should be aware of the following standing advice in relation to ancient woodland buffers: 'For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic' (https://www.gov.uk/guidance/ancient-woodland-ancient-treesand-veteran-trees-advice-for-making-planning-decisions#avoid-impacts-reducemitigate-impacts-and-compensate-as-a-last-resort).	No veteran trees are proposed for removal, nor is the removal of any trees within an ancient woodland proposed. The plans provided with the veteran tree survey show the buffer zones around veteran trees which have been calculated following current UK guidance. Proposed cables will all be routed outside of any veteran tree or ancient woodland buffers unless absolutely unavoidable. Cables that pass below any veteran trees or ancient woodlands will be installed using trenchless techniques at a depth greater than 2m in order to avoid any potential root involvement, unless there is any more practicable suitable routes through the RPA that avoid potential damage to roots (Such as being laid within existing ducting/ within the structure of an existing road) The proposed scheme currently does not warrant an extension to the standard 15m buffer around ASNW. This will however be further assessed following detailed design.
RR-0793-046	Reproduced OCC Arboricultural Comments from letter dated 9th	OCC's previous arboricultural comments continue to apply. In addition, the proposed changes have the potential to have further arboricultural impacts, including impacts to trees, hedgerows and to	Further arboricultural information will be produced following detailed design. This will give a greater level

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	August 2024 (Oxfordshire County Council's Response to Botley West Solar Farm Targeted Consultation (14 June to 28 July 2024)).	woodlands, including ancient woodlands which is an irreplaceable habitat. Without the detailed arboricultural information requested in our previous comments an accurate assessment cannot be made."	of accuracy about the possible impacts upon trees. In targeted locations.
RR-0793-047	Reproduced OCC Arboricultural Comments from letter dated 8 February 2024 (Oxfordshire County Council's Response to Botley West Solar Farm Phase 2 Consultation (closing date 8th February 2024))	Document reviewed: Strategic Arboricultural Impact Assessment and Method Statement dated 30 November 2023 Volume 3 Appendix 8.3 Impact to Trees and Woodlands It is acknowledged that this proposal covers a very large area and that in section 1.4 of the report it states 'Due to the wide spreading nature of the site and the inherent low impact of solar farm installation, a full site survey was deemed impractical and unnecessary, however, a walkover survey of the proposed cable routes between sites was carried out to help inform the best route for the cable to take'. However, without a detailed survey of all trees and woodlands adjacent to all works that have the potential to impact on these features, it is not possible to make an accurate and detailed arboricultural assessment of the impact of this proposed development. A detailed arboricultural survey would need to be completed in order to provide accurate comments on realistic tree related implications of the proposal. As shown within the report, between sections 5.13 – 5.17, each section (1-5) has the potential to have significant impacts, particularly the high voltage cables, where it states tree removal will be most likely. It is	An underpinning part of the solar schemes design provides buffers to all hedgerows and woodlands. Therefore, by-design reducing / removing tree impacts have been integral to the schemes design. Following detailed design, potential clashes between the development and trees will be identified and targeted BS5837:2012 surveys of high-risk areas will be carried out. This information will feed into targeted AIA/AMS that will detail tree loss/retention and protection measures required in each of these identified areas. Locations where the cables routes clash with trees and hedgerows will be identified and assessed within the targeted AIA/AMS following detailed design. The proposed scheme will be situated outside of any veteran tree or ancient woodland buffers unless absolutely unavoidable. If required, cables will be installed using trenchless techniques at a depth greater than 2m in order to avoid any potential root involvement, unless there is any more practicable

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		noted within the report that it refers to Ancient Woodland in section 2.23 and the requirement to provide suitable buffers in accordance with Forestry Commission and Natural England standing advice. The Applicant is advised that 15m is a minimum requirement for ancient woodland buffers and the guidance states 'Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone' (https://www.gov.uk/guidance/ancientwoodland-ancient-trees-and-veteran-trees-advice-for-making-planningdecisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort). It is not clear from reviewing the report if an assessment has been made on whether any veteran or ancient trees will be impacted by the proposal. A detailed arboricultural survey would need to be completed to determine the presence and the precise location of any veteran or ancient trees that may be present on the site and, potentially, impacted by the proposals. It is noted that within the key to the plans it refers to a veteran tree buffer 15m offset and veteran tree is shown within the Glossary at Appendix F. However, in accordance with Forestry Commission and Natural England standing advice buffers for ancient and veteran trees should be calculated as: 'For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area' (https://www.gov.uk/guidance/ancient-woodland-ancient-trees-andveteran-trees-advice-for-making-	suitable routes through the RPA that avoid potential damage to roots (Such as being laid within existing ducting/ within the structure of an existing road). The proposed scheme currently does not warrant an extension to the standard 15m buffer around ASNW, the end land use (i.e. solar farm) is low use, low impact and limited pressure upon the nearby woodlands. This will however be further assessed following detailed design. A Veteran tree survey has been carried out and the locations and buffers of all veteran trees on site have been given. The 15m Buffer on the tree survey plans refers to ancient woodlands and has incorrectly been labelled as veteran trees. This will be corrected on any future plans provided. All ASNW and veteran tree buffers have been calculated following the appropriate UK guidance. 193 c) https://www.gov.uk/guidance/national-planning-policy-framework

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		planning-decisions#avoid-impacts-reduce-mitigateimpacts-and-compensate-as-a-last-resort). An assessment of the impacts of the proposal on ancient and veteran trees is therefore essential and the Applicant should be aware of section 186c of the NPPF updated December 2023, which states: '186. When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶⁷ and a suitable compensation strategy exists;' (https://www.gov.uk/government/publications/national-planning-policyframework--2). It is not clear from the information submitted where the exact routes of the high voltage cables will be located. It is noted from reviewing the various plans within the report, it appears to show a wide route located within the roads. However, more specific details of its exact location are required before a detailed arboricultural impact assessment can be made. As locating the cable route in verges would be completely unacceptable due to the significant impact that would have on the roots of a very significant number of trees that are located adjacent to the roads. The routes for cabling between the separate blocks of solar panels also don't appear to be shown on the plans. Therefore, the impact of these works is unknown and has the potential to be very significant, being essential that it is accurately assessed.	Currently the proposal requires no loss or deterioration of any ASNW or veteran trees. The impact on these will be further assessed in future arboricultural reports during detailed design. Agreed, for this reason, arboricultural impact assessments will be updated following detailed design. More site-specific information will be provided in targeted AIA/AMS during detailed design. Micro-siting and/or replacement tree planting may form part of the mitigation strategies. Scenario 6 will be amended in the AMS during detailed design. This amend will be to remove scenario 6 and replace it with a scenario where the need for excavation within the RPA of a tree will trigger a detailed targeted AIA/AMS and arboricultural impact/ mitigation of the works explored. Scenario 9 will be amended in the AMS during detailed design. This amend will be to remove scenario 9 and replace it with a scenario where the need for foundations within the RPA of a tree will trigger a detailed targeted AIA/AMS and arboricultural impact/ mitigation of the works explored.

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		There also appears to be various areas on the plans where the route for the cables will have significant impacts to tree root protection areas (RPAs), that would appear avoidable by relocating the route to avoid RPAs. Whilst the specific routes have not been confirmed, it has the potential to impact on the following trees, where its shown within the RPAs of the following trees: T92, T94, T95, T96, T110, H16, T160, T161, T173, T175, T178, T185, T186, T187, T199, T204, T206, G42, T215-T217, T222, G46, T229, T230-T234, T237, T238, T248, T249, T271, G60, G59, T279, T283, T284, T286, T287, G70, T394, T395, T404, T405, T406, T407, T408, T410, T411, T415, T416-T421, T422-T424, T426, T428-T430, T432, T434, T437, T438, T439-T446, G101, T449, T456, plans to the South of Tree Survey (Page 13 of 16) seem to be missing and therefore, the impact of the route for cables further South is not defined, meaning the impact has the potential to be significant. Some of the Tree Protection Protocol found at Appendix C of the report requires amending and supplementing with additional information. Its acknowledged, the scale of this project is very large, and whilst the report includes a comprehensive protocol on tree protection measures, I consider that the information must be more site specific. For example, individual tree protection plans must be provided for all the sites. So, it is clear to the construction team, where exactly tree protection barriers, ground protection, utility routes etc is to be located. This is also a requirement as set out at Table B.1 of BS 5837:2012 and is standard practice for protecting trees during construction works. Tree Protection Protocol Scenario 6 is not acceptable. Using	Noted. A CAVAT assessment of any public OCC trees will be carried out, on any trees requiring removal and suitable mitigation planting proposed.

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		machinery to excavate within RPAs is likely to lead to excessive and adverse arboricultural impacts, contrary to section 7.2.1 of BS 5837:2012 which states 'To avoid damage to tree roots, existing ground levels should be retained within the RPA. Intrusion into soil (other than for piling) within the RPA is generally not acceptable, and topsoil within it should be retained in situ. However, limited manual excavation within the RPA might be acceptable, subject to justification. Such excavation should be undertaken carefully, using hand-held tools and preferably by compressed air soil displacement'. NJUG Volume 4 also provides guidance for installing utilities within proximity to trees. Similarly, Tree Protection Protocol Scenario 9 is not acceptable. Strip foundations within the RPA of trees can lead to extensive root loss and should be avoided. Machinery for excavating in RPAs should also be avoided. Specific Policies within the Tree Policy for Oxfordshire that would be applicable where impacts are proposed to Oxfordshire County Council trees, including highway trees, are shown below and are available on the following link: Tree policy for Oxfordshire Oxfordshire County Council Policy 11: The County Council will retain and maintain existing, healthy OCC trees and removal will only be considered for the following reason(s): • Dead, dying and / or dangerous • Proven to be causing significant structural damage • Considered by the Tree Service to be an inappropriate species for the location.	

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		Or: When removal is required as part of an agreed tree management programme. Policy 14: The County Council will seek compensation from any organisation or individual requesting removal of any public tree(s) related to an approved planning application that are the responsibility of the County Council. Compensation will be determined as calculated by Capital Asset Valuation of Amenity Trees (CAVAT). Policy 16: All organisations, companies or operatives must be able to demonstrate adherence to national guidelines and standards related to the protection and retention of trees listed in the reference and supporting documents section of this policy when working on land owned by the County Council; under the responsibility of the County Council; or within the Public Highway of Oxfordshire. When working near to or under trees, this must be referenced in their relevant method statements. Reference & Supporting Documents • BS 3998:2010 – Tree Work: Recommendations (or as revised) • BS 5837:2012 – Trees in relation to design, demolition and construction (or as revised) • BS 8545:2014 – Trees from nursery to establishment in the landscape (or as revised) • Oxfordshire Street Design Guide • Application of Tree Policy Guidance (or as revised) • Manual for Streets • Highways Act (or as revised)	

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		• Common sense risk management of trees (FCMS024) • Roots and Routes: Guidelines on Highways Works and Trees • Joint Mitigation Protocol • National Planning Policy Framework (NPPF) • National House Building Councils Standards - Chapter 4.2 (or as revised) • NJUG Publication Volume 4: Issue 2 (or as revised) • National Tree Safety Group (NTSG) - Risk Limitation Strategy • Forestry Commission - Operations Note 051 • Capital Asset Valuation of Amenity Trees (CAVAT) • Oxfordshire Together (OxTog) • Urban tree selection may be aided by Trees and Design Action Group (TDAG) publication - The relevant district local plan policies are shown below: • Vale of White Horse Local Plan 2031 Part 1, Core Policy 44: Landscape • West Oxfordshire Local Plan 2031 POLICY EH2 • The Cherwell Local Plan 2011-2031 Policy ESD 10, Policy ESD 13 and Policy ESD 17."	
10. Historic Environment			
0793	Oxfordshire County Council	Engagement to date has resulted in amendments to the scheme which have removed the areas of the highest archaeological interest and significance from any intrusive works; this is very much supported. The submission of further information is required and it is understood the Applicant will be submitting this in due course.	The Applicant acknowledges Oxfordshire County Council's support of the mitigation strategy in which all areas within the Project Site containing significant archaeological remains have been excluded from the development. This approach is set out in Table 7.14 and paragraph 7.9.7 of ES Chapter 7: Historic environment [CR1-003].

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			Oxfordshire County Council refer to the submission of further information. The Applicant understand this to be a reference to the reports on the results of the programme of archaeological trial trenching within the Order Limits for the Project. These reports are being prepared and will be submitted into the Examination as soon as possible.
0793	Oxfordshire County Council	The proposed solar farm covers a large area and as such the archaeological interest and potential within the scheme is both complex and varied. The applicant has submitted an archaeological desk-based assessment which has been used to inform the production of the Historic Environment chapter of the Environmental Statement [APP-044]. Overall, this assessment does highlight the archaeological interest based on existing records appropriately.	The Applicant acknowledges Oxfordshire County Council's statement that the desk-based assessment presented as ES Appendix 7.1: Historic environment desk-based assessment [APP-131] is appropriate.
0793	Oxfordshire County Council	Not all surviving archaeological deposits will have been previously identified however and there is the potential for further archaeological remains, including sites of demonstrably equivalent significance to scheduled monuments, to survive within the area. This is acknowledged in the heritage assessment [APP-044].	The Applicant welcomes this comment from Oxfordshire County Council and fully agree that not all surviving archaeological deposits will have been previously identified.
0793	Oxfordshire County Council	The applicant has engaged with County Archaeological Services from a very early stage in the application process and a record of some of these engagements has been included in the Historic Environment chapter. As a result of these discussions the applicant has confirmed that they will not be using cable trenches behind the line of panels to connect them, often the	The Applicant welcomes this comment from Oxfordshire County Council.

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		largest impact of such solar farm proposals, which is welcome and has reduced the potential archaeological impact of the scheme.	
0793	Oxfordshire County Council	A geophysical survey of the site has been undertaken in line with an agreed written scheme of investigation (WSI) and the results of this have also been incorporated into the heritage assessment.	The Applicant welcomes this comment from Oxfordshire County Council.
0793	Oxfordshire County Council	In general, the geophysical survey report is acceptable, but it only contains processed greyscale plots of the results along with interpretation plans and omits to include a sample of the raw data as a xy trace plot as set out in the agreed WSI. A sample of the raw data as a xy trace plot will need to be included in the geophysical survey report in line with best practice.	The geophysical survey report is presented as ES Appendix 7.3: Geophysical Survey Report Parts 1-8 [APP133-140]. An updated version of the report, including sample xy trace plots, will be submitted into the Examination as soon as possible.
0793	Oxfordshire County Council	Based on the results of this survey, a number of areas of the highest archaeological interest and significance have been removed from any intrusive works likely to have an impact on this significance which has further reduced the potential archaeological impact of this proposed scheme. These areas are proposed for non-intrusive planting schemes which we strongly support.	The Applicant acknowledges Oxfordshire County Council's support of the mitigation strategy in which all areas within the Project Site containing significant archaeological remains have been excluded from the development and retained as managed grassland. This approach is set out in Table 7.14 and paragraph 7.9.7 of ES Chapter 7: Historic environment [CR1-003].
0793	Oxfordshire County Council	Geophysical survey alone, however, cannot be relied upon to have identified all archaeological deposits on a site as there are a myriad of factors affecting whether or not archaeological features and deposits are detected by such surveys and significant archaeological	The Applicant agrees that geophysical survey alone cannot be relied on to identify all areas of archaeological significance. Consequently, a programme of trial trenching has been undertaken within the Project Site which examined not only the

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		deposits can survive which were not identified by such surveys. Additionally, the nature of such non-intrusive surveys means that they cannot provide the evidence of the date and level of survival of such deposits required to be able to appropriately assess the significance of an archaeological heritage asset. We have therefore advised the applicant of the need for these results to be tested through a trenched evaluation. The need for this evaluation is also highlighted within the archaeological assessment and Historic Environment chapter. A written specification for this evaluation has been agreed and the fieldwork is almost complete. This evaluation has identified a range of archaeological deposits including several significant sites that could be considered to be of demonstrable equivalent significance to a scheduled monument. These include a likely Roman Temple site, high status Bronze Age barrow, another Bronze Age barrow with a later Early Medieval cemetery, a Roman Villa and further aspects of a scheduled Roman Small Town at Sansom's Platt. These sites are within areas that have been removed from any intrusive works, but the final extent of these areas will need to be based on the results of the archaeological evaluation. The report for this evaluation has yet to be completed however and so the results have not been fully incorporated into this assessment. The results of this archaeological evaluation will need to be submitted with this application before a full assessment of the	areas of likely archaeological significance identified by the geophysical survey and/or other data sources, but also areas where no likely archaeological remains had been identified through these non-intrusive surveys and desk-based work. The programme of trial trenching was agreed in advance with the Lead Archaeologist at Oxfordshire County Council and was continuously monitored by the Applicant's historic environment consultant and the Lead Archaeologist at Oxfordshire County Council. The programme of trial trenching found that all areas identified by the geophysical survey and/or other data sources are containing significant archaeological remains did indeed contain such remains, and the trial trenching recovered information concerning the nature, date and extent of these significant archaeological remains. No additional areas of significant archaeological remains were identified beyond those that were known or suspected from the geophysical survey. In other words, the results of the geophysical survey were found to be very accurate, and it is considered highly unlikely that any unknown significant archaeological remains are present within the three main areas of the Project Site where solar PV panels are proposed. The mitigation strategy agreed with the Lead Archaeologist at Oxfordshire County Council is to ensure that all areas within the Project Site that contain significant archaeological remains are excluded from the development and retained as managed grassland. This approach is set out in Table

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		significance of the identified archaeological deposits can be assessed and the impact of this proposal on this significance understood. Once this has been completed, the areas removed from intrusive works may need to be revised to take into account the full extent of the areas of significance.	7.14 and paragraph 7.9.7 of ES Chapter 7: Historic environment [CR1-003]. It is the Applicant's position, as set out in paragraphs 7.9.13 – 7.9.20 of ES Chapter 7: Historic environment [CR1-003], that the likely impact on archaeological remains of national and/or regional importance during the operation and maintenance phase of the proposed development would actually be beneficial. This is due to the removal of areas containing such archaeological remains from the current arable regime (which puts the archaeological remains at risk from regular damage through ploughing) and the placement of these areas within managed grassland. The reports on the results of the programme of archaeological trial trenching within the Project Site are being prepared and will be submitted into the Examination as soon as possible. These results will be examined against the areas that have been excluded from the development on the basis that they contain significant archaeological remains. If any of these areas need to be adjusted on the basis of the results of the programme of archaeological trial trenching, this will done through the preparation and submission of a revised version of the Illustrative Masterplan (ES Figures 2.1a – 2.4c [AS-020]).
0793	Oxfordshire County Council	There are a number of impacts for cable connection that have not been subject to archaeological evaluation as the specific locations have not yet been finalised. These works however could impact on currently unidentified archaeological deposits which could be of	A second phase of trial trenching will examine land within the proposed cable routes where these are outside the three main areas of the Project Site. The locations of these trenches will be agreed in advance with the Lead Archaeologist at Oxfordshire County

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		such significance to require physical preservation. This has the potential to have a considerable impact on the viability of the scheme. These areas will also need to be subject to archaeological evaluation to assess the significance of any archaeological heritage assets within these areas before the impact of this proposed scheme on this significance can be assessed.	Council. A further 32 trenches within the Central Site Area will also be excavated and recorded within this second phase of trial trenches. These are ones where the locations have been agreed with the Lead Archaeologist at Oxfordshire County Council but where the work could not be undertaken as part of the previous programme due to poor ground conditions.
0793	Oxfordshire County Council	The applicant has also submitted an outline WSI for the subsequent investigation of archaeological deposits during the development. This outline WSI however will need to be based on the results of the archaeological evaluation, which is yet to be completed and so we cannot agree this is an acceptable scheme at this stage. This scheme also contains a number of technical issues which are not in line with our standard requirements which would need to be addressed before we could accept this as an appropriate scheme of investigation. These technical issues would best be dealt with in consultation with the applicant's archaeological consultants directly and a revised outline WSI submitted following the completion and reporting on the results of the archaeological evaluation.	The Outline Written Scheme of Investigation [CR1-005] sets out a proposed programme of further archaeological investigation to be undertaken in the event of the DCO being granted. This programme would include completion of the second phase of trial trenching described above, if it has not been possible to complete this work before the Examination has concluded. Requirement 10 in Schedule 2 of the Draft Development Consent Order [AS-010] establishes that no part of the development could commence until an archaeological written scheme of investigation for that part has been agreed with the relevant planning authority. The written scheme of investigation must be substantially in accordance with the Outline Written Scheme of Investigation [CR1-005]. The Lead Archaeologist at Oxfordshire County Council has separately provided comments on the Outline Written Scheme of Investigation [CR1-005]. The comments will be addressed within a revised Outline Written Scheme of Investigation that will be

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			submitted into the Examination at a suitable Deadline.
0793	Oxfordshire County Council	Overall, there has been good engagement with the applicant and their archaeological consultants which has resulted in amendments to the scheme to reduce the impact on archaeological heritage assets. This engagement and consultation have resulted in a suitable level of archaeological evaluation to identify previously unknown archaeological sites and deposits. The report for this evaluation will need to be submitted with this application and the applicant is aware of this and has indicated this will be submitted in due course. Once the evaluation report has been submitted we can provide further detailed advice.	The Applicant welcomes the comment from Oxfordshire County Council regarding the level of engagement leading to the mitigation of potential impacts on archaeological remains. It is the Applicant's position, as set out in paragraphs 7.9.13 – 7.9.20 of ES Chapter 7: Historic environment [CR1-003], that the likely impact on archaeological remains of national and/or regional importance during the operation and maintenance phase of the proposed development would actually be beneficial. This is due to the removal of areas containing such archaeological remains from the current arable regime (which puts the archaeological remains at risk from regular damage through ploughing) and the placement of these areas within managed grassland. The reports on the results of the programme of archaeological trial trenching within the Project Site are being prepared and will be submitted into the Examination as soon as possible.
0793	Oxfordshire County Council	Our comments relate solely to the impact of this proposed scheme on archaeological sites, and we would defer and support the advice on the setting of designated archaeological remains, such as Sansom's Platt, to Historic England.	The Applicant agrees that Historic England are the principal consultee with regard to the likely impacts and effects of the Project on designated archaeological remains (i.e. Scheduled Monuments) and their settings.

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11. Agricultural Land Use			
RR-0793-063	Oxfordshire County Council	Approximately 40% (216ha) of the land proposed for solar PV would be sited on Best and Most Versatile (BMV) agricultural land. At least 4ha of this will be permanently lost through siting of the Nation Grid substation. It is also important to highlight the cumulative impacts of solar development on BMV agricultural land in Oxfordshire, as numerous smaller solar proposals are also currently under the consideration of the district councils. Further comments on cumulative impacts and impacts on BMV will be provided in the Local Impact Report.	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6). Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8). The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). This agrivoltaic approach has been adopted in other DCO applications, such as Cleeve Hill Solar Park (2020), Little Crow Solar Park (2022),

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			and Sunnica Energy Farm (2024). The commitment to retain agricultural land use is included in the Outline Landscape and Ecology Management Plan [APP-235], secured under Requirement 6 of the Draft DCO [AS-009]. Table 17.23 of ES Chapter 17 [APP-054] sets out the other projects, plans and activities considered in the CEA for agricultural land use and PRoW, which include other solar developments within the cumulative study area. The cumulative impacts between the Project and other proposed developments, including nearby solar developments on agricultural land quality and land use are considered in section 17.11 of ES Chapter 17 [APP-054].
12. Waste and resources			
0793	Mineral Resource	The Applicant's MRA calculates the lost mineral to be 3.58 million cubic metres which at a conversion rate of 1.5 tonnes per cubic metre would be 6.87 million tonnes. The latest Local Aggregate Assessment has an Annual Provision Rate (APR) of 0.986 million tonnes. This means that the mineral lost would be equivalent to 6.97 years of supply for Oxfordshire which would be almost equivalent to a 7-year landbank requirement set out in the NPPF. The amount of sand and gravel that would be prevented from being worked therefore considered significant, and would come at a time when central government are prioritising house building and growth which will need the adequate supply of sand and gravel to meet demand.	The mineral referred to by OCC is an identified safeguarded resource of sharp sand and gravel, but not an allocated reserve. The effects of the proposed development upon the resource is provided in the Applicant's Mineral Resource Assessment (MRA), Appendix 11.14 [APP-195], and areas of potentially viable sand and gravels are shown in Figure 10, relative to the Order Limits. The MRA includes consideration of the need for the development against sterilisation (which will not be permanent), and the practicality of prior extraction. The total prior extraction of materials, and associated overburden, once buffer zones and the fragmented

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		Oxfordshire has now stopped work on the Site Allocations Document and commenced work on a new Plan to incorporate both the core policies and site allocations. Nevertheless, policy M5 of the Core Strategy states that prior to the adoption of the Site Allocations Document, permission will be granted if the application is, among other things, consistent with the locational strategy in policy M3 of the Core Strategy. The Core Strategy remains the current Development Plan document and therefore policy M5 still applies. This does not mean that there is no need for mineral extraction in Northern Oxfordshire. The Applicant states that the planning permission would be temporary, and would be removed at the end of forty years. It would be the case that the development would be in place throughout the life of the next Minerals and Waste Local Plan, and most likely for the one following that. Also, it should be noted that paragraph 168(c) of the NPPF states that when determining planning applications for end of life extensions to existing renewable sites, local planning authorities should give significant weight to the benefits of utilising an established site. This suggests that once the precedent of using the site for a solar farm, there would be planning policy support for continuing to do so once the temporary permission has expired. This principle could be applied to Botley Solar Farm in the future, and this would further prevent or hinder the future working of the mineral. Given that the mineral being prevented or hindered from being worked and potentially sterilised if the solar farm is never removed, would be almost the equivalent of our required seven year land-bank, and that the	land parcels are factored in, has not been considered viable in the Applicant's assessment. In the Applicant's view the Proposed Development is substantially in accordance with the relevant policies of the adopted Minerals and Waste Local Plan.

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		mineral would be unable to be worked a minimum of 40 years, this would be a major negative outcome from a Mineral Planning Authority perspective. The Applicant has reiterated the value of the renewable energy, but they have assessed the value of the mineral as moderate to negligible, and therefore have not addressed the need to overcome a major effect on the mineral resource. Consequently, the case for building the part of the solar farm that would prevent or otherwise hinder future working and possibly sterilise the mineral resource has not been justified.	
0793	Waste hierarchy and waste management.	The potential impacts as set out in table 18.23 (maximum design scenario considered for the assessment of potential impacts) only considers the reduction in landfill capacity; it does not consider alternatives to waste management methods further up the waste hierarchy. The mitigation measures in table 18.24 (mitigation measures to be adopted as part of the Project) states that the Outline Site Resources and Waste Management Plan includes targets to divert waste from landfill. This seems out of step with table 18.23. This section also states that an Operational Waste Management Plan will be agreed with the Waste Planning Authority prior to development commencing, but the disposal of the waste produced is fundamental to the planning decision and so this information should be provided prior to any consent being granted. The proposal does not include a proposal for a waste management facility, and so there are no waste policies to apply to the application, but the amount and type of waste that would be created by the development would	The Applicant will develop the commitments made in the outline Operational Management Plan [APP-234] and the outline Decommissioning Plan [APP-236] regarding recycling at appropriate facilities, and requirements associated with the delivery of these plans will have to be approved by OCC as the Minerals and Waste Planning Authority.

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		require waste management in the future. This would be a large amount of additional waste that would need to be planned for in future Waste Local Plans. The waste impact of the site is therefore a major negative one.	
13. Green Belt			
RR-0793-062		Inappropriate Development in the Green Belt 10.1 The Overarching National Policy Statement for Energy (EN-1) states at paragraph 5.11.37 that: "...when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation. Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources." 10.2 In the Planning Supporting Statement [APP-225] the Applicant recognises that the proposal constitutes inappropriate development in the Green Belt. The proposal would introduce a substantial amount of new development into open countryside and have a significant impact on openness. It will be for the Secretary of State to determine whether or not the very special circumstances put forward by the Applicant (primarily in relation to the generation of energy from renewables) outweigh the harm to the Green Belt. OCC is yet to decide whether the very special circumstances put forward by the Applicant (primarily in relation to the generation of energy from renewables) outweigh	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [APP-7.1]. At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. That VSC approach and weight to be attached to relevant factors accords with the requirements of NPS EN-1 section 5.11 and, in particular, para 5.11.37. The overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test. Arguably, because of this policy, the Applicant need not have made a VSC case. However, the Applicant has submitted a VSC case in the hope and expectation that the ExA and SofS will confirm that the test has been met in line with policy. The VSC case is also made to address concerns by Interested Parties (IP).

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		the harm to the Green Belt. This point will be considered further in the Local Impact Report, but at this stage it is felt that more could be done to reduce the harm to openness.	
14. Impact on School Sites			
RR-0793-064/ RR-0793-065	School Sites	Impact on School Sites (OCC Property Comments) OCC previously raised concerns about glint and glare and noise and vibration on school sites within proximity of the proposed development. These comments do not appear to have been taken into account in the submitted application and are therefore reproduced below. Reproduced OCC Property Comments from letter dated 8 February 2024 (Oxfordshire County Council's Response to Botley West Solar Farm Phase 2 Consultation (closing date 8th February 2024)) Oxfordshire County Council (OCC) Property manages land that is located within 1km distance from the central proposed photovoltaic (PV) solar farm site. The land currently contains buildings, which are occupied by Yarnton Pre-School and William Fletcher Primary School. Oxfordshire County Council also manages land that is located within 1km distance from the southern proposed PV solar farm site. The land is currently being used as a playing area for the Cumnor C of E Primary School. The school is also maintained and controlled by Oxfordshire County Council. The safeguarding of children is essential and is a requirement for all schools operating in Oxfordshire. This is set out in the Keeping Children Safe in Education 2023, which is guidance issued by the Department of Education and explains that all school staff have a duty to establish and	Regarding glint and glare impacts, please refer to the response under Section 15 below. Regarding noise and vibration impacts, please refer to the response under Section 16 below.

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		maintain a safe environment for children, where they are encouraged to communicate with each other and take part in activities. Whilst OCC Property supports the proposed scheme in-principle, as it will assist the Government with meeting their goal of delivering new renewable and low carbon energy infrastructure, they wish to raise concerns in relation to several matters which arise primarily from the effects the proposed scheme would have on the preschool and primary schools in terms of noise and glint and glare impacts during the operation of the development. Specifically, there are fears that this development could potentially prevent them from carrying out their educational duty.	
15. Glint and Glare			
RR-0793-065	Glint & Glare impact on School Sites	Glint and Glare Matters OCC Property has reviewed the contents of the Glint and Glare Report (Volume 3, Appendix 4.4) and has some concerns regarding the impact of the proposed solar panels creating glint and glare issues to the playing area and building of both the preschool and primary school. The technical study has not identified either the pre-school or primary schools as sensitive receptors, and therefore it is difficult to ascertain whether the proposed scheme will produce solar reflections that will have a detrimental impact on the staff and children of the primary schools and pre-school. Children spend a considerable amount of time outside, and it is therefore critical to ensure that the playing areas for the primary schools and preschool will remain a safe space for the children.	Commercial and educational properties are not typically considered within the standard methodology. This is because there is lesser significance on amenity compared to a dwelling as these properties are not inhabited permanently. Pager Power has considered Yarnton Preschool, William Fletcher Primary School, and Cumnor C of E Primary School alongside the geometric modelling and it can be determined that no impacts are predicted towards these schools. Any predicted solar reflections towards Yarnton Preschool and William Fletcher Primary school will be screened such that significant views of the reflecting panel are not possible. Solar reflections are not geometrically possible towards Cumnor C of E Primary school as the establishment is located due south of the panel area.

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		Paragraph 193 of the NPPF highlights that under the 'agent of change' principle, those responsible must do all they can to ensure that new development will not have an adverse impact on the facilities of the primary schools and preschool and the children that are under their care. Therefore, OCC Property would need to be satisfied that the overall level of intensity of solar glare observed by children and school staff would be limited. As a consequence, OCC Property would appreciate if the technical study that was undertaken to inform the Preliminary Environmental Information Report could be updated in order to assess the glare and glint impacts on the Yarnton Preschool, William Fletcher Primary School, Cumnor C of E Primary School and their associated playing areas to ensure that they will not be adversely impacted by the scale and proximity of the proposed scheme. OCC Property would also like to note that there is a planning application(21/03522/OUT) and appeal APP/C3105/W/23/3329587) that are currently awaiting decision, which concern the land immediately to the north of the William Fletcher Primary School. Should either the planning application or appeal succeed, then approximately 1.7 hectares of playing pitches and amenity space will be provided to the William Fletcher Primary School to enable its expansion. OCC Property would therefore be grateful, if the technical study were to also assess the glare and glint impacts on the land that is being proposed to form the new playing area of the school. OCC Property will not support proposals, where they could prevent William Fletcher Primary School from fulfilling its educational functions, including potentially expanding its facilities on the land that is shaded purple below.	

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16. Noise and Vibration			
RR-0793-066 (OCC)		OCC has concerns that the noise and vibration impact assessment does not include schools.	The noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference EN010147/APP/6.3, with additional information provided in ES Volume 2 (Figures) [EN010147/APP/6.4], and ES Volume 3 (Appendices)[EN010147/APP/6.5]. The assessment shows that sound from the development will be equal to or below the background sound level at residential receptors and so will not be a significant source of sound. The schools which are located close to the site boundary have been identified as; • The Marlborough Church of England School • Bladon C of E Primary School • LVS Oxford - Special Education School in Oxfordshire • William Fletcher Primary School • St Peter's C.E. Primary School • Eynsham Primary School These school are located either away from the site boundary (e.g. William Fletcher Primary School) or at a greater distance from the site boundary than other nearby noise sensitive receptors. The assessment identifies that sound from the development will be below the background sound level at each residential receptor which has been identified, and so the impact at the school will be either equal to or less than this potential noise impact.

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17. Fire Safety			
RR-0793	Access for the fire service.	There is currently limited information in relation to vehicle access routes. Consideration should be in place for ensuring suitable fire service access and egress routes are provided, along with suitable hardstanding. Site information should be stored and available for fire crews on arrival to understand any emergency response plan in place and the response time for onsite technical assistance. This site currently does not show any buildings that the fire safety order would apply too. Should this change, it is taken that any buildings or structures will be subject to a Building Regulations application and subsequent statutory consultation with the fire service, to ensure compliance with all the functional requirements of The Building Regulations from B1 to B5.	Further, the assessment utilises the methodology stated in British Standard 4142:2014+A1:2019 – 'Methods for rating and assessing industrial and commercial sound, which is only applicable to residential receptors. Safe and reliable access for emergency services during the operational life of the Botley West Solar Farm is addressed in the Outline Code of Construction Practice [APP 232] Section (1.8.21-1.8.22). The internal access network has been designed to accommodate emergency vehicles, including fire engines and ambulances, with durable, all-weather tracks maintained across the site. Strategic emergency access points will remain unobstructed throughout the operational phase.
18. Community Benefits and Impacts			
RR-0793	Oxfordshire County Council	The host authorities are working with affected parishes on a suitable mechanism for collecting and implementing a community benefit fund as a means by which to secure benefits if the project receives planning consent.	The Applicant acknowledges the concerns and notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant. The fund will be part of a Community Benefits package outside the scope of the DCO application, to be agreed with the relevant local authorities. (See Planning Supporting Statement paragraphs 3.5.24 and 8.4.71 APP/7.1). The

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		The amount currently being offered by the Applicant (£200,000 p/a) is inadequate for a development of this scale. Negotiations on a community benefit agreement (CBA) are therefore expected to continue alongside the planning process and will be supplemental to any section 106 agreement required to mitigate the adverse impacts of development.	Applicant has held discussions with Parish, District and County Councils and has now agreed to an annual fund payment of £525 per MW, £441,000. This will deliver £16,5000,000 over the 37.5 year life of the project, before indexation. The Scottish figure of £5000 per MW is applicable to onshore wind turbines, not solar farms.



Botley West Solar Farm

Applicant Responses to Relevant Representations - Vale of
White Horse District Council [RR-1086]

June 2025

PINS Ref: EN010147
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I. Applicants' Comments in response to the Relevant Representations submitted by Vale of White Horse District Council [RR-1086]

Table I-1: Applicants' Comments on Relevant Representations

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
1. Green Belt			
RR-1086-1	Green Belt	Policy CP13 of LPP1 addresses development in the Oxford Green Belt and seeks to ensure the Green Belt is protected to maintain its openness and permanence. This policy specifies that within the Oxford Green Belt development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. Due to the size and nature of the development, the proposed solar farm would not comply with any such NPPF provisions. The proposal would therefore be deemed to be inappropriate development in the Oxford Green Belt.	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [APP-7.1]. Appendix 1-7 addresses compliance with relevant planning policy. At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. The Applicant considers there are VSC matters that justify those parts of the Project development that fall within the Green Belt. Notwithstanding, the overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test. Arguably, because of this policy, the Applicant need not have made a VSC case. However, the Applicant has submitted a VSC case in the hope and expectation that the ExA and SoS will confirm that the test has been met in line with policy. The VSC case is also made to address concerns by Interested Parties (IP).
RR-1086-2	Green Belt	In addition to the harm caused by reason of inappropriateness, development can have further harm to the Green Belt by reducing openness. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. As advised in the NPPF (paragraph 142) the essential characteristics of Green Belts are their openness and their permanence. The openness of the Green Belt has a spatial as well as a visual aspect.	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm [APP-7.1]. At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. This section deals with openness, in particular the visual and spatial aspects of openness. In respect of the analysis of the function of the Green Belt, and its purposes, both IP's, including the host authorities, will need to

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		From a spatial perspective, the proposal would introduce a substantial amount of development into an open area. This includes the panels and transformer units, along with the associated development of access tracks and security fencing. VWHDC considers the proposal would cause moderate harm to the openness of the Oxford Green Belt in spatial terms. The visual impacts of the development will be assessed in detail in the LIR, but it is without doubt the development will likely result in some loss of visual openness of the Green Belt to further diminish the spatial openness of the Oxford Green Belt. DCO application material confirms the applicant accepts there is conflict with the purposes of Green Belt and harm to openness, but considers these are limited, temporary and reversible. VWHDC disagrees. The proposal would encroach on the countryside. There is also little detail currently provided of what alternative sites outside of the Green Belt have been considered. VWHDC therefore remain to be convinced that the applicant's stated very special circumstances (as listed in paragraph 8.4.57 of appendix 8 of the Planning Supporting Statement – document 7.1) can be demonstrated to outweigh the harm to the Green Belt.	revisit this in light of the PPG on Green Belts published February 2025. Amongst other matters, this PPG has changed the way in which one should assess the contribution land makes to the relevant Green Belt purposes. Some IP's (e.g. RR 1007) are relying upon existing Green Belt Studies prepared by the authorities in asserting a conflict between the Applicants analysis and the importance attributed to certain gaps between settlements in these studies e.g. In particular, some refer to the Oxford Green Belt Study prepared by LUC dated October 2015 and the importance of various parts of the Green Belt e.g. the gaps between <i>Long Hanborough/Bladon and Bladon/Begbroke</i>. However, this study may now be redundant or at least largely undermined in light of the new guidance. The new PPG on Green Belts (27 February 2025) states at paragraph: 004 Reference ID: 64-004-20250225, that: <i>"...authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d. Considerations for informing these judgements are set out below:</i> <i>Purpose A – to check the unrestricted sprawl of large built up areas</i> <i>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas..."</i> <i>Purpose B – to prevent neighbouring towns merging into one another</i> <i>This purpose relates to the merging of towns, not villages.</i> <i>Purpose D – to preserve the setting and special character of historic towns</i> <i>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. "</i>

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			Studies such as that undertaken by LUC now appear to be out of date as they have assessed the functions of gaps between <i>villages</i>, when it is <i>towns</i> that now should be considered in relation to Purpose A, B and D. Hanborough/Bladon and Bladon/Begbroke and indeed Kidlington are all villages close to the Order Limits of the Applicants Project. The Applicants' assessment of its effect upon the Green Belt in light of this new guidance remains unaltered except in respect of Green Belt purpose B – to prevent neighbouring towns from merging into one another. Here the Applicant is of the view that conflict is less than previously assumed. In their analysis, the Applicant had identified that the narrowest point of the Green Belt which the project affected, was between Bladon and Begbroke. Under the new guidance this analysis is largely redundant insofar as both these settlements are 'villages' and these are now effectively excluded from assessment in the latest guidance. The nearest 'towns' now affected by the Project are Woodstock to the north, Witney to the west, Oxford to the east and Abingdon to the south. Given the much more significant areas of openness between these towns and the Project, the threat of merging is diluted even further. In respect of whether there is a sequential test or consecutive approach when it comes to finding development sites in Green Belts, as some IP's claim i.e. that one has to consider brownfield sites first before selecting Green Belt land, the Applicants position is that policy in this respect is a 'preference' not an absolute 'requirement'. This position is explained below. Only in NPS EN-3 para. 2.10.29 and 2.10.31 does it make a reference to this matter.

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			Para.2.10.29 states: <i>"While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land..."</i>. At para 2.10.31 of NPS EN-3, it notes the 'preference' for development to be on suitable brownfield...land". In NPS policy terms therefore, the Applicant characterises policy as a preference in policy terms not a requirement, and even then only where possible and where suitable. To reinforce the point, in NPS EN-3, para 2.3.9, it states that as most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land). Beyond the NPS policy above, the NPPF (para 148) talks about a sequential test but only when considering a change in Green Belt boundaries or the release of Green Belt. The applicant is not seeking a change to nor a release from the Green Belt, and in the Applicants view therefore, para 148 does not apply. Notwithstanding the policy position on this matter, the Applicant, in its search for suitable sites, looked at previously developed and brownfield land for the Project as potential suitable sites. For example, the Applicant looked at land near to, and grid connection at, the former Didcot A power station, but that was controlled by RWE and neither the connection nor the land was available to the Applicant. Shortly after the Applicant's enquiry, both the land (part of) and connection was subsequently used by a recently consented, and now constructed, data centre.

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			The authority also refers to the southern site as not being suitable for a solar site. The Applicants explain in Chapter 5 of the ES [APP-042] how it came to select the locations and scale of the solar farm and considers that any adverse effects have been avoided or mitigated to an acceptable level. Notwithstanding, the overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test. Arguably, because of this policy, the Applicant need not have made a VSC case. However, the Applicant has submitted a VSC case in the hope and expectation that the ExA and SofS will confirm that the test has been met in line with policy. The VSC case is also made to address concerns by Interested Parties (IP).
2. Planning Policy			
RR-1086-3	Green Belt	Green Belts also serve five specific purposes. As outlined at paragraph 143 of the NPPF, these purposes are to check unrestricted sprawl of large built-up areas, prevent neighbouring towns merging, safeguard the countryside from encroachment, preserve the setting of historic towns and assist in urban regeneration (by encouraging the reuse of urban land). Any conflict with these purposes will also result in other harm to the Green Belt. The 2024 Oxford Green Belt study in support of the forthcoming Joint Local Plan identifies the southern site area as has having a high contribution to check unrestricted sprawl, a medium contribution to prevent neighbouring towns merging, a high contribution to safeguard the countryside from encroachment, and a	The Planning Supporting Statement (PSS) [APP-7.1] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 7. At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. This section deals with openness, in particular the visual and spatial aspects of openness. In respect of the analysis of the function of the Green Belt, and its purposes, both the Applicant and IP's, including the host authorities, will need to revisit this in light of the PPG on Green Belts published 27 February 2025.

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		medium contribution preserve the setting of historic towns. VWHDC therefore do not consider grey belt as defined in the NPPF applies to the southern site.	Amongst other matters, this PPG has changed the way in which one should assess the contribution land makes to the relevant Green Belt purposes. Some IP's (e.g. RR 1007) are relying upon existing Green Belt Studies prepared by the authorities in asserting a conflict between the Applicants analysis and the importance attributed to certain gaps between settlements in these studies e.g. In particular, some refer to the Oxford Green Belt Study prepared by LUC dated October 2015 and the importance of various parts of the Green Belt e.g. the gaps between <i>Long Hanborough/Bladon and Bladon/Begbroke</i>. However, this study, and the 2024 Oxford Green Belt study referred to by the VWDC, may now be redundant or at least largely undermined in light of the new guidance. The new PPG on Green Belts (27 February 2025) states at paragraph: 004 Reference ID: 64-004-20250225, that: <i>"....authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d. Considerations for informing these judgements are set out below:</i> <i>Purpose A – to check the unrestricted sprawl of large built up areas</i> <i>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas..."</i> <i>Purpose B – to prevent neighbouring towns merging into one another</i> <i>This purpose relates to the merging of towns, not villages.</i> <i>Purpose D – to preserve the setting and special character of historic towns</i> <i>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. "</i>

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			Studies such as that undertaken by LUC and the 2024 green Bely Study now appear to be out of date as they have assessed the functions of gaps between <i>villages</i>, when it is <i>towns</i> that now should be considered in relation to Purpose A, B and D. Hanborough/Bladon and Bladon/Begbroke and indeed Kidlington are all villages close to the Order Limits of the Applicants Project. The nearest towns for these purposes are now Banbury and Woodstock to the North, Witney to the West, Oxford City to the East and Abingdon to the South. Visual impact is also dealt with the Landscape and Visual Impact chapter of the ES [APP-045]. Notwithstanding, the overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test. Arguably, because of this policy, the Applicant need not have made a VSC case. However, the Applicant has submitted a VSC case in the hope and expectation that the ExA and SoS will confirm that the test has been met in line with policy. The VSC case is also made to address concerns by Interested Parties (IP).
RR-1086-4	Benefit	Furthermore, as the main benefit in this case will be the renewable energy generated by the scheme, it is crucial for the Secretary of State to assess that 840MW per annum (enough to power 330,000 homes) can be achieved, as the amount of renewable energy that can be produced should be reflected in the weight applied to it as a benefit.	The Applicant notes this point. There is no lower or upper limit to the production of renewable energy. All projects are likely to be required to meet the urgent need (NPS EN-1, para. 4.2.21).

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3. Agricultural Land Use			
RR-1086-5	VoWH DC	In relation to agricultural land use, over 40% (216ha) of the land proposed for solar PV would be sited on BMV land, with some 80.5ha of productive arable land in the Vale, identified as a mixture of Grade 2, 3a and 3b arable land. At least 4ha of this will be permanently lost through siting of the National Grid substation. It is also important to highlight the cumulative impacts of solar development on BMV agricultural land, as several solar proposals are currently under consideration locally. Further comments on cumulative impacts and impacts on BMV will be provided through the LIR.	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6). Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8). The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). This agrivoltaic approach has been adopted in other DCO applications, such as Cleeve Hill Solar Park (2020), Little Crow Solar Park (2022), and Sunnica Energy Farm (2024). The commitment to retain agricultural land use is included in the Outline Landscape and Ecology Management Plan [APP-235], secured under Requirement 6 of the Draft DCO [AS-009].

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4. Landscape and Visual Impacts			Table 17.23 of ES Chapter 17 [APP-054] sets out the other projects, plans and activities considered in the CEA for agricultural land use and PRoW, which include other solar developments within the cumulative study area. The cumulative impacts between the Project and other proposed developments, including nearby solar developments on agricultural land quality and land use are considered in section 17.11 of ES Chapter 17 [APP-054].
RR-1086-6	Landscape Character	VWHDC considers the scheme will result in a significant change and harm to the open and rural landscape character, both within the wider setting and to the rural landscape setting of Cumnor Parish. There will be a loss of attractive views and a negative impact on views across and over the valley floor and to the rising land both to the north towards Wytham and south towards Cumnor, from the recreational network of public rights of way (PRoW) in the area including the Oxford Greenbelt Way. There would also be a loss of tranquillity.	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan [APP_062]. The project is considered to be fully reversible, unlike residential development (GLVIA3, paragraph 5.52). A solar farm retains the open characteristics of the existing landscape. The existing field boundaries would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm is removed. The Landscape and Visual Impact Assessment [APP-045], includes an assessment of cumulative effects at section 8.11. The Parish of Cumnor, in common with other areas within which the Project, is located in a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained

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			and enhanced as part of the comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. The perceptual characteristic of tranquillity is considered in the LVIA. Thirty-three photomontages have been produced as part of the application [APP-072 to 080]. These are representative of the impacts of the Project and illustrate that the characteristics of the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours. The existing public rights of way network would be retained and managed during the construction of the project in accordance with the outline Public Rights of Way Management plan [APP-232]. They would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. As such, the public's access would not be restricted. For more information on effect on the public rights of way network see ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP-054]. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change. The effect on wildlife is considered in ES Chapter 9 - Ecology and Nature Conservation [APP-046]. The Applicant welcomes the acknowledgement in this relevant representation that significant steps have been taken to address the respondent's concerns, while noting that concerns still remain. The Landscape and Ecological Management Plan (LEMP) is outline only. A detailed LEMP is secured by a requirement [APP-235] of

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			the DCO and will be developed and agreed with all three local planning authorities. Separation between villages is a spatial planning matter and is considered in the Planning Supporting Statement (PSS) including the effects on Green Belt [APP-225].
RR-1086-7	Methodology	VWHDC has concerns about the Methodology and Assessment of the Landscape Character and Visual Impacts of the scheme and opine that the project should not be considered temporary when assessing the impact. There are also issues with the classification of significance. VWHDC raise concern about the underlying Methodology of the assessment. Section 8.5.22 states "For the purpose of this assessment, any effects with a significance level of Moderate or less are not considered to be significant in terms of the EIA Regulations." However, assessment is not as simple as this statement implies. When assessment results in multiple negative effects, such as on connecting PRoW routes, cumulatively this would result in a significant impact. Each assessment of an effect should not be looked at in isolation and discarded as not significant but viewed holistically as part of the whole picture. In the table on page 24 of Chapter 8, it is stated 'Assessment considers effects from individual Representative Viewpoints. But it is acknowledged within the LVIA that effects may be present along length of the PRoW or roads for example.' However, there is limited reference to this in the wider LVIA. In section 8.9.125 it states: 'However, where Moderate significance of effect has been identified at multiple points along the same PRoW, sequentially these Moderate adverse effects could be considered significant.'	Neither the EIA Regulations nor GLVIA3, or subsequent landscape Institute technical guidance notes set out a formulaic / standard set of criteria / definitions for sensitivity, magnitude of impact or significance. The phrase 'significant in EIA terms' holds no specific meaning (GLVIA3, paragraph 3.32). The LVIA uses the methodology set out at Section 8.4 of the LVIA Chapter 7 [APP-045]. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24). The assessment of the significance of effects that would be experienced by users of the Public Rights of Way follows the methodology set out in the LVIA Chapter 8 [APP-045]. GLVIA3 explains that "There are no hard and fast rules about what makes a significant effect, and there cannot be a standard approach since circumstances vary with the location and landscape context and the type of proposal" (paragraph 5.56). GLVIA3 also notes that "Even with qualified and experienced professionals there can be differences in the judgements made" ... "Ideally and for complex projects more than one person should be involved in the assessment to provide checks and balances, especially in identifying the likely significant effects" (GLVIA3, paragraph 2.25). Three Chartered Members of the Landscape Institute, all with experience of assessing the effects of solar farms have worked on the Project. Additional checks and balances have been provided by other, experienced practitioners, Chartered Members of the Landscape Institute, within RPS, who have not been involved with the Project. Where possible, viewpoint locations were selected based on published important views. All viewpoints were agreed with the

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		This is not picked up elsewhere in the LVIA, and VWHDC therefore do not consider that the landscape and visual impact of the development including the PRow network is adequately covered in the LVIA.	local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects.
RR-1086-9	Reversibility	VWHDC also have concerns to how the project, regarded as fully reversible, is being applied to the assessment of effects. i.e. 8.9.119 "The magnitude of impact, for those parts of the PRow where views are available, would be Medium, resulting in a Moderate adverse significance of effect. Considering users' High sensitivity, reversibility of the solar farm and proposed mitigation, albeit not yet having matured and reached its' intended design function. This effect is not significant." High sensitivity, medium impact would give a Moderate to Major adverse significance, which is significant under EIA assessment, this significance should not be reduced because the solar farm is stated as being reversible.	The EIA Regulations and GLVIA3 do not set criteria for what is judge significant or not. GLVIA3 recommends against setting thresholds (GLVIA, paragraph 3.32). In assessing the magnitude of impact of a development reversibility forms part of the overall assessment, which also includes size/scale and geographical extent. GLVIA3 provides guidance on reversibility at paragraph 5.52 (Reversibility is a judgement about the prospects and the practicality of the particular effect being reversed in, for example, a generation. This can be a very important issue- for example, while some forms of development, like housing, can be considered permanent, other, such as wind energy developments, are often argued to be reversible, since they have a limited life and could eventually be removed and/or the land reinstated." This latter example is the case with the Botley West Solar Farm – it has a limited life and would be removed and the land reinstated. For the purposes of the Botley West Solar Farm Project, those effects of Minor or below are judged to be not significant. Those effects of Major and above are judged to be significant, Where the effects are deemed to be Moderate the assessment follows the guidance contained within Landscape Institute Technical Guidance Note-2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) (Landscape Institute, August 2024). Point 3(5) "...Moderate effects may or may not be significant and justification would be needed in the methodology or the receptor assessment as to whether a moderate effect is significant or not." A combination of effects is used, where a visual receptor may experience differing effects, e.g. along a road or footpath. It is the Applicant's current position that the methodology used to assess the landscape and visual effects, of the Botley West Solar

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			Farm Project, follows best practice guidance GLVIA3 and subsequent technical guidance notes). The judgements made in the Landscape and Visual Impact Assessment (LVIA) are clear, transparent, correct and proportionate to the Project. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The Landscape and Visual Impact Assessment [APP_6.3] has identified and acknowledged a number of significant effects upon visual amenity. Particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP_6.3], at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape and would be retained after the removal of the solar farm. A minimum of 5m width has been allowed for public rights of way. In many locations this has been increased, e.g. where public rights of way 416/5/10 and 416/5/20 pass through the northern section of the Project, crossing Dornford Lane. New hedgerow planting to the north and south of these public rights of way and tree planting to the south have also been included. As shown on the Illustrative Masterplan [APP-062].

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			The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045]. Where possible, viewpoint locations were selected based on published important views, such as those identified in the Cumnor Parish Neighbourhood Plan Important Views Report (February 2021). As stated above, all viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects. No existing mature hedgerows and trees would be removed as a result of the Project. Including those along the Claude Duval Right of Way National Cycle Route. Only small sections of hedgerow would require removal to accommodate certain aspects of the Project, such as access and highway visibility. Hedgerow to be removed is illustrated on the Hedgerow Removal Plans [APP-013].
RR-1086-11	Informing Masterplan	There is further concern about the LVIA work and how this underplays the impacts of the scheme but without taking these concerns into account VWHDC is unsure	Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-

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		of how the LVIA work has been used to inform the scheme Masterplan, especially for location of solar arrays. There has been little adjustment to the layout of solar arrays in reference to where impacts including significant impacts have been found to reduce Landscape and Visual effects. This issue was touched on in the council's response to the PEIR where it indicated that 'the layout of the scheme does not indicate that there has been much modification to the design of the scheme to minimise impacts in response to receptors and constraints. For example, small areas of solar panels within the southwestern area of the site either side of the footpath and adjacent to the ancient woodland are retained rather than a broader look at the project at a landscape and project scale to see if it would be more appropriate not to include these small areas of solar. Again, small areas of solar arrays are formed once servicing constraints are added south of Denman's Farm. It may be more appropriate due to the proximity to the PRoW and the residential property not to have these small areas under solar panels.' However, there does not seem to have been a review of the masterplan in response to these comments. Another example is the area around Stratford Lane and the B4027, Illustrative Masterplan Figure 2.1B North Site Area 2 of 2. This illustrates that the Masterplan should be revised to reduce the impact of the scheme.	228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology in sections 8.4 and 8.5 of the LVIA [APP-045] to support those judgements. All the landscape consultants that have worked/are working on the project are Chartered Members of the Landscape Institute and experienced in assessing the landscape and visual effects of solar farms within this type of landscape.
RR-1086-12	Viewpoints	The removal of areas of land due to archaeological constraints, has left two small areas of solar either side of PRoW 416/24/10, and a small area of solar to the south on the higher land. The Masterplan proposes a new cycle link through this area to connect to the	The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project.

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		National Cycle Route which runs through the centre of the northern site area. Section 8.9.162 of the EIA covers representative Viewpoint 8: View looking southeast from footpath 416/24/10, near Hordley House. It states a part of the northern site would be visible on top of the pronounced ridgeline across the view. Solar panels would appear as a single row over the ridge. However, the viewpoint description does not describe the impact to the rest of the footpath as it passes through the middle of the solar panels. Section 8.9.168 Representative Viewpoint 11: View looking west from bridleway 379/10/20 (Clause Duval Way). States that solar panels would occupy rising ground to a ridgetop in the middle view. VWHDC query if the assessment of the viewpoint is correct. If it is a high sensitivity user with a noticeable change, then the impact would be higher than Moderate and would be Significant. The above illustrates that if the Masterplan was looked at holistically after constraints were added, the more isolated areas of solar which are prominent in views from PRoW, that have PRoW routes passing through them or adjacent to them and are often on higher ground should have been removed to better balance provision against impact. The Masterplan therefore needs to be revisited and revised to reduce the impact of the scheme in numerous areas, including other areas with similar concerns with regards to locations of solar panels such as Bladon, Worton Heath, the Priory Area east of Begbroke, east of Pinsley Wood, south of Church	Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP_149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045]. The Landscape and Visual Impact Assessment [APP_6.3] has identified and acknowledged a number of significant effects upon visual amenity. Particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP_6.3], at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape. The Project's main elements, i.e. the solar panels, have a maximum height of 2.3m, and follow the natural contours of the local landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located.

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		Hanborough, north of Cassington/ Yarnton Road, Denman's Farm and also west of Cumnor Road.	
RR-1086-13	Suitability in landscape character and LVIA terms	Section 5.6 of the EIA covers the site location and scale and section 5.6.15 says 25.6.15 'After negotiations with many other landowners in the area, the Applicant secured land at Denman's Farm, immediately under the 400kV line to the west of Botley'. However, it does not necessarily follow that the offered land is suitable for solar development. With regards to the Denman's Farm area, the proposed solar development in the Vale is predominately on open exposed slopes in the Greenbelt, which the Vale do not assess as suitable for solar development due to the harm to the open and rural landscape character and impact on views. This is supported by the comments in the letter from Cultural Landscapes and Historic Gardens Committee of ICOMOS-UK (International council on monuments & sites) dated 26th July 2024 - '3. South Solar Farm, SE of Farmoor Reservoir: (2km E-W; 0.7 km maximum width; 17 small bays; substation at western end with access to overhead power line which crosses northern part of site.) At least half of this proposal is on exposed north facing arable slopes, which would be highly visible. It would almost certainly be obvious from Farmoor reservoir recreation area. The site is in the Oxford Green Belt with footpaths useful to the population of the nearby city, being accessible by bus. This site is an unsuitable place for a solar farm and should be omitted from the proposal. However, the substation site is well chosen in a fold of the land.' Furthermore, the emerging evidence base of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 includes suitable broad locations for renewable energy schemes, including Ground mounted solar on the	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan [APP_062]. The project is considered fully reversible, unlike residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries, which provide structure to the landscape, would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed. The Landscape and Visual Impact Assessment [APP-045], includes an assessment of cumulative effects at section 8.11. The Parish of Cumnor, in common with other areas within which the Project, is located in a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation

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		Emerging Policies Map and under the CEQ Climate and Environmental Quality Evidence Base. It does not however indicate capacity for solar development within the proposed development site area. https://www.southandvale.gov.uk/joint-local-plan-2041-examination-library/. Emerging evidence also includes a Joint Landscape Character Assessment 2024 (which is considered the most up to date LCA for the district), Renewable Landscape Sensitivity Assessment, Tranquillity Assessment and Local Landscape Designation Review. The Candidate Northern Thames Valley Local Landscape Designation covers some of the south-western section of the Southern site area.	scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Thirty-three photomontages have been produced as part of the application [APP-072 to 080]. These demonstrate the impacts of the Project and illustrate that the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours. Existing public rights of way would be retained and have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. As such, the public's access would not be restricted. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change.
RR-1086-15	Presentation	The way information is presented in the Landscape Chapter of the ES makes it difficult to follow the submitted information and cross referencing between multiple sets of information is required to be able to read and look at the submitted information. For example, the Representative Viewpoints. The location of these is given on the Representative Viewpoints Figure Number 8.11. This uses 1:50,000 as base mapping, so it is difficult to see the exact locations of these Representative Viewpoints on the ground and 1:50,000 mapping gives limited	Where possible, viewpoint locations were selected based on published important views. All viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects. The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3].

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		information with regards to field boundaries, 1:25,000 mapping even if it is not to scale is easier to follow. The ZVT shading on plans makes it hard to follow the PRow network in and adjacent to the site. There are no plans where the viewpoints are shown on the Masterplan layout, to help understand what can be seen in the Representative Viewpoints. Due to the scale of the application, it is difficult to cross reference plans to understand how viewpoints relate to the site layout. There are no Plans in the Landscape Package which clearly illustrate the existing and proposed rights of way (by type), and associated ProW numbering which are referred to in the text. While a numbered ProW plan is giving in Figure 17.5, there is no plan where this information is proposed on the Masterplan to aid understanding of the Representative Viewpoint Locations. Whilst Representative Viewpoints do have a 1:50,000 plan extract, they do not contain the scheme layout to aid understanding of the view. Mapping at 1:50,000 also does not aid with the understanding of field boundaries, the viewing arrow is small and does not illustrate the extents of the view on the photograph. Photomontages do not contain a map extract to aid their understanding and illustrate the section of view shown and how that relates to the site layout. Concern with the presentation of photo viewpoints and visualisations were raised in our consultation response to the Scoping dated June 2023 and the PEIR, and some of these concerns are still present. Volume 3 Appendix 8.4: Photomontage Methodology 1.1.1 refers to methodology used for annotated photographs, photomontages or photo wireline, but predominately only covers the photomontages. A	The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan [APP_062]. The project is considered fully reversible, unlike residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries, which provide structure to the landscape, would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed. The Landscape and Visual Impact Assessment [APP_6.3], includes an assessment of cumulative effects at section 8.11. The Vale of White Horse, in common with other areas within which the Project, is located in a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. Thirty-three photomontages have been produced as part of the application [APP-072 to 080]. These demonstrate the impacts of the Project and illustrate that the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours. Existing public rights of way would be retained and have managed hedgerows and trees to the north and south, where appropriate,

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		request was made at the PEIR stage that due to the scale and public interest of the project, for all viewpoint plans to be annotated with key features and have wirelines to highlight the areas of the proposed solar arrays (but not necessarily full modelling of the arrays), so the areas and extent of the scheme can be easily understood by all. A map extract to indicate the location of the view is also useful and recommended by guidance. Concern was also expressed that some viewpoints and visualisations did not cover the whole extents of the view of the solar farm from that viewpoint, for example VP48 and VP45. VP5, has a 5a, 5b and 5c covering views in different directions and that approach should also be provided for others such as VP48 where the scheme is present to the east and west of the northern viewpoint included in the ES. VWHDC also raised concerns (both Scoping and PEIR) that the range of viewpoints are limited, such as the wider footpath network to the north and east of the site. GLVIA expects the identification of the people within the area who will be affected by the changes in views and visual amenity. The now withdrawn P23/V2624/FUL Red house solar planning application (a similar scale to the southern area of Botley West) used 30 different photo locations covering 13 different routes in its assessment report. In contrast Botley West uses 11 to cover the southern extents of the application. This is not comprehensive enough for the scale of development and does not fully cover views from the PRow network. There are numerous places that views have not been taken, including those highlighted in the Cumnor Neighbourhood Plan such as Viewpoint 5b, 12, 23, 7, 12 and 17.	which other time would limit available views to the solar arrays. As such, the public's access would not be restricted. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change.

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		The plan below was provided as part of the PEIR response and highlighted views from the Neighbourhood Plan along with other locations that had not been covered by the assessment. Additional viewpoints were requested from these locations as part of the PEIR, and concern was also raised about the range of viewpoints being limited at the Scoping Stage. Our previous comments also included that the impact of mitigation on views and landscape character needed to be considered in the LVIA assessment. Many available views are larger scale over the wider landscape, whereby screening a view so solar panels or other development cannot be seen also has the impact that the landscape scale view is no longer obtainable. This potential impact of mitigation should be covered and factored into the assessment of views. VWHDC currently do not see that there has been assessment on how mitigation to prevent seeing the solar panels impacts on the ability to enjoy the changing views of the landscape within the EIA. Further comments on the magnitude of these effects and the effectiveness of any proposed landscaping mitigation will be provided through the LIR. The proposal for the Botley West Solar Farm is not acceptable. However, as part of the Development Consent Order process the LVIA, EIA and associated documents should be revised to better cover the impacts of the proposal and be used to help look at the acceptability of the Masterplan and to help shape the Masterplan to reduce the impact of the proposal. The proposed solar arrays in the Vale of White Horse should be removed from the application.	

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As this is a larger scale project over multiple areas, the EIA needs to acknowledge this and cover these impacts in sufficient detail for all areas so the journey from baseline to the Masterplan can be clearly understood and the scheme designed to minimise its impact.			
5. Decommissioning			
RR-1086	Length of permission	42 years is not 'temporary' – it is a long time, and should be considered permanent – including in the assessment of impacts.	Solar farms are generally consented on the basis that they will be time-limited in their operation and pursuant to NPS EN-3 paragraph 2.10.65 are therefore “described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.” NPS EN-3 also recognises that an upper limit of 40 years is typical, but that applicants may seek consent without a time-period or for differing time-periods of operation (paragraph 2.10.66). The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any Project. Consent for the Project is sought for 42 years from commencement to de-commissioning and removal. The development is not proposed to be permanent, and the lifetime of the Botley West Project aligns with other similar solar farm projects of this scale and type, and which have been consented under the NSIP regime. The Project, as assessed in the EIA process and described in the Environmental Statement, takes this duration into account.
RR-1086	Case Law	A recent solar development in Green Belt appeal decision covers this issue, concluding that 40 years was judged to not be “temporary”.	An appeal decision, for a Section 78 Town & Country Planning Application, for a 25MW solar farm located in Green Belt in Dacorum Borough, dismissed in November 2023, is cited in the Relevant Representation from Vale of White Horse Council. The

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			Council's comments highlight that the Inspector commented that '40 years is not temporary' – PINS appeal reference no. APP/A1910/W/23/3317818. However, the Applicant is able to direct the ExA to other Section 78 appeals, including a number allowed during 2024, where Inspectors have commented that whilst 40 years is a significant period of time, it is not permanent, and they have given limited weight to the point in terms of the permanence and openness of Green Belt. The following PINS appeal references are relevant in this context; APP/L3245/W/23/3329815; APP/T3725/V/23/3332671; APP/P3040/W/23/3329235; APP/J1535/W/23/3334690; APP/P0119/W/22/3294810; APP/N1920/W/22/3295268; APP/M1595/W/23/3328712; APP/B1550/W/23/3329891

6. DCO Process

RR-1086-10	Vale of White Horse District Council	There is concern about how the evidence base of this application has fed into the Masterplan and site proposals. Chapter 4 Approach to EIA states in section 4.1.2 'the key elements in EIA for a Nationally Significant Infrastructure Project (NSIP) are: - Iterative project design, taking feedback from consultation and applying it to the development design process on an ongoing basis throughout the EIA process; - Scoping and ongoing consultation, including consideration of responses and how these should be	The Applicant has pursued an iterative approach to the development of the Illustrative Masterplan [AS-019 & AS-020] throughout the evolution of the Project, including a significant period of design development at the pre-Scoping stage where various key principles and approaches were adopted. The scheme has continued to evolve through Scoping, PEIR and subsequent ES design freeze, and the summary of changes between PEIR and submission are set out in Table 6.2 of Chapter 6 of the ES [APP-043]. Subsequent to submission further changes have been submitted as design continues to evolve.

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		addressed as part of the EIA process; c. Technical environmental impact assessments, including baseline studies, input to the design process, and identification and reporting of likely adverse or beneficial significant environmental effects; d. Proposed measures to avoid, reduce or mitigate likely significant adverse effects; e. Consultation on a Preliminary Environmental Information Report (PEIR); and f. Preparation and submission of the Environmental Statement (ES).' However, there has been very limited changed in the proposed Masterplan during the process. The site layout was indicated in the phase one consultation documents, The Botley West Solar Farm concept plan and phase one community consultation leaflet November 2022. The overall layout proposed in the EIA is very similar. It is noted most site fieldwork and reports were undertaken after the publication of the concept plan. LVIA field work started Winter 2022, Archaeology Geo Physical work March 2023 to August 2024, PRow surveys May to August 2024 and Soils 2023 to 2024. While there have been changes to the Masterplan, these have been very much constraint driven, such as the removal of Areas of Archaeological Interest. There is little evidence that the Masterplan has been revisited, to sense check (especially after areas of constraints have been removed) or the Masterplan has been looked at in any detail in how it could be changed to reduce the impact of the proposed scheme, especially due to the scale of the proposals.	Much of the more detailed fieldwork did take place following the original concept design, and this ia logical way to stress test the proposals. The development has been designed to avoid, reduce or mitigate likely significant impacts, but also to take advantage of emerging opportunities and benefits, such as public access, community food growing and educational opportunities.

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7. Grid Connection and Battery Storage			
RR-1086-14	Vale of White Horse District Council	There is concern on the uncertainty of the requirements for the grid connections. This is a large and major component of the application, and the expected infrastructure and grid connections associated with the project should be included to allow the cumulative impacts of the structures to be assessed. Information provided about the appearance of the grid connection is limited, but these are often very industrial in appearance. It is also noted from recent solar applications in the district, that Battery Energy Storage Systems (BESS) are often included or have followed closely after. If battery storage is expected to be associated with this project, the cumulative impacts of this should also be covered in the ES, especially due to the greenfield, rural and greenbelt location.	The Applicant signed a Bilateral Connection Agreement with National Grid in September 2021 to export 840MEW electricity at a new substation at Farmoor, connected to the 400kV overhead line from Cowley to Walham. The details are set out in the Grid Connection Statement [APP-019]. The Applicant has no plans for BESS and there is none included in the Application. Chapter 7, Cumulative Effects and Inter-relationships [APP-057] includes a table 20.5, Summary of Short List of Other Developments. There is no application for a BESS in this list. For assessment purposes, it is assumed that the NGET substation will be within the Project Site. To cater for the eventuality that National Grid decides not to locate the NGET substation in the Project Site, then an assessment has been made under a cumulative scenario for its delivery in an area adjoining the west of the Southern Site, south of Farmoor Reservoir. Additionally, as part of this cumulative scenario, the assessment is made for the substitution of solar panels on the land formerly set aside for the NGET substation. National Grid would be responsible for seeking any necessary consents and permissions.
8. Historic Environment			
1086	Vale of White Horse District Council	A clear table has been provided identifying all known assets within 2km of the application site boundary or those within the ZTV where this extends beyond the 2km mark. Chapter 7 of the ES and its relevant appendices state that the settings assessment has been undertaken in accordance with good practice guidance and specifically Historic England's settings guidance GPA3. Of those that have been scoped in, the test appears to have largely been based upon whether the application	The Applicant's assessment of likely impacts and effects of the Project in respect of the Blenheim Palace World Heritage Site is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England.

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		site has a visual relationship with the asset – can it be seen from the asset or not. Worryingly, the way assets are experienced from the wider context, where there is a direct visual connection or not, does not appear to have been considered. Whilst the assessment of the wider context and setting of the WHS of Blenheim Palace has been considered in this manner, this does not appear to have been the case for other heritage assets, and particularly those assets in VWHDC area and the designated conservation area.	The detailed assessment of likely impacts and effects of the Project on other designated heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment [APP-142]. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>. The assessment included a scoping exercise through which designated heritage assets were scoped into, or out of, the detailed assessment. The existence of a direct visual connection between the heritage asset and the proposed development was the principal issue used to decide which designated heritage assets were scoped in and which were scoped out. This does not mean that other issues were not also considered, but visibility is usually the most important. This is noted in paragraph 10 of the 2017 Historic England guidance document which states '<i>The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset</i>'. Whilst it is possible for the significance of a heritage asset to be harmed by change within its setting despite a complete lack of intervisibility, this is rare and the outcome in terms of impact and effect is very unlikely to be significant. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach is necessary.
1086	Vale of White Horse District Council	Of particular concern is the lack of assessment of the relationship of Cumnor Village Conservation Area to its surroundings and whether the existing context contributes to our understanding of its significance or not. Whilst the Neighbourhood Plan assessment has been referred to, no reference is made to the Cumnor	The Cumnor Conservation Area was scoped out of the detailed assessment presented in ES Appendix 7.5: Settings Assessment [APP-142] on the basis that the Project Site does not form any part of the setting of the Conservation Area. The location of the Conservation Area in relation to the proposed development is indicated on Figure 3c in ES Appendix 7.1: Historic environment

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		Conservation Area Appraisal (Jan 2011) or the way it is described in its landscape context within this document. Having reviewed the LVIA photomontages of the proposed arrays (Viewpoints 42-55 where modelled in Figures 8.248 to 8.371 Parts 8 & 9 of 9) on the slopes below Cumnor Village it is clear that the manner in which the approach to Cumnor village from the north is currently experienced will fundamentally alter both from the B4017 Cumnor Road and the Public Rights Of Way that cross the landscape to the north of the village. Whilst it is accepted that the conservation area will not be directly impacted by the proposal, the open agricultural and rural approach to the village will be significantly changed as a result and this has not been assessed within the submitted ES. Scoping reasons provided as purely on whether the site can be seen from the conservation area and not in how it is experienced in its current context, is not a robust or consistent way of assessing the contribution made by the setting of assets in accordance with good practice guidance. The transformation of the character of this area from rolling countryside to a semi-industrial landscape will impact the way Cumnor Conservation Area is understood and experienced from its wider setting, eroding the sense of the settlement as a small hill-top village set in open countryside on the edge of the more sub-urban area of Oxford City. VWHDC considers the area forms an important rural transition between countryside and city and the proposals will erode this along with the contribution it makes to the significance of the designated historic	desk-based assessment [APP-131] and is described in paragraphs 1.5.50 – 1.5.52 of that document. Reference is made here to the 2011 <i>Cumnor Conservation Area Appraisal</i>, contra the assertion made in the Relevant Representation that this document had not been reviewed. The Conservation Area is focused on the historic village core but also spreads out along the main roads as a result of a dispersed pattern of historic farms being located on these routes. The key contributions towards the heritage significance of the Conservation Area come from the historic buildings within the village core, the relationships between these buildings and the spaces which divide and enclose them. The wider rural setting of the Conservation Area makes some contribution towards its heritage significance. Map 4 in the 2011 <i>Cumnor Conservation Area Appraisal</i> shows the location and direction of 'Important Views' into and out of the Conservation Area. There are no identified 'Important Views' towards the Project Site, and indeed no part of the Project would be visible in views out of the Conservation Area. In their Relevant Representation, VWHDC themselves state '<i>Whilst it could be a low level of impact, not more than Negligible Adverse, it is an adverse impact that should have been more thoroughly examined within the ES Heritage Impact Assessment</i>'. The Applicant's methodology for the assessment of likely effects of the Project on the historic environment is set out in Section 7.5 of ES Chapter 7: Historic environment [CR1-003]. As indicated in Table 7.8 of that document, Conservation Areas are generally ascribed a 'Medium' level of sensitivity or value. For a proposed development to have a significant adverse effect on a heritage asset of 'Medium' sensitivity or value, the perceived magnitude of impact would need to be 'Medium' or greater, in other words the change within the setting of the asset would result in its heritage

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		village conservation area. Whilst it could be a low level of impact, not more than Negligible Adverse, it is an adverse impact that should have been more thoroughly examined within the ES Heritage Impact Assessment. Furthermore, hiding the scheme behind hedgerows and enclosing PROW with high hedges will also significantly change the way in which the character of the agricultural landscape can be experienced in the context of the conservation area and listed buildings around the application site and is not necessarily encouraged as mitigation.	significance being clearly harmed (as per Table 7.9 in ES Chapter 7: Historic environment [CR1-003]). As pointed out in the response above to the previous comment, the purpose of Environmental Impact Assessment is to identify likely significant effects (rather than all effects) and therefore a proportionate approach is necessary. Screening of the Project with hedgerows is part of the overall mitigation with regard to landscape and visual impacts. Specifically with regard to the Cumnor Conservation Area and associated listed buildings, the new hedgerows and the reinforcement of existing hedgerows would not greatly affect the ability to appreciate and understand the historic character of the landscape.
1086	Vale of White Horse District Council	It is accepted that the temporary construction compound proposed to the east of the B4017 on the rising land towards Cumnor village will be temporary through the construction phase only and replaced by PV arrays prior to completion of the construction phase. The visual and character change here is mitigated only by its temporary nature, but this should be secured by appropriate conditions requiring removal during the operational phase.	Requirements will be attached to the DCO to formally require the removal of temporary construction compounds.
1086	Vale of White Horse District Council	Both the grade II listed Toll Gate House at Swinford Bridge and the Grade II* and Scheduled Ancient Monument of Swinford Bridge have been assessed as suffering No Change as a result of the proposals. These assets lie near to possible cable routes between the Southern and Central sites. VWHDC is minded to agree that the significance of these assets is unlikely to experience any change because of the proposals. It should be noted however that Swinford Bridge is both	The Applicant notes that VWHDC is minded to agree that there would be no impact on the heritage significance of the Grade II* listed and Scheduled Swinford Bridge and the Grade II listed Toll Gate House attached to the bridge. The Applicant would refer VWHDC to paragraph 1.5.16 of ES Appendix 7.1: Historic environment desk-based assessment [APP-131], in which Swinford Bridge is clearly identified as both a Scheduled Monument and a Grade II* listed building.

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		listed and scheduled but reference to it as a scheduled monument has been missed from the assessment.	
1086	Vale of White Horse District Council	Upper Whitley Farm, a grade II listed farmhouse, is assessed as suffering No Change. The assessment has focused on the views out from the main farmhouse but has not considered how the asset is experienced from its wider setting or how it is viewed in its wider setting. Having reviewed the proposed layout plans, the way in which the farmhouse will be understood in its agricultural context will only be impacted to a minor degree with most of the area closest to the house either preserved as woodland or grassland not under solar panels. There may be glimpsed views of the arrays to the east when approaching the farmhouse, but these are filtered by existing woodland planting and do not impact the experience of the agricultural approach to the listed building. It is therefore agreed that there will be no change here.	The Applicant notes that VWHDC agrees that there would be no impact on the heritage significance of the Grade II listed Upper Whitley Farmhouse.
1086	Vale of White Horse District Council	Milestone on the Oxford Road (NHLE number 1181978) lies within the cable route area. The impact assessment is that there will be a minor adverse impact during construction, operation and decommissioning. It is not proposed to move the asset which is significant both for its age and its specific location relative to the areas it marks. As it is not proposed to change the asset's location, VWHDC is satisfied that the impact to its significance will be minor changes to the road conditions largely during construction and decommissioning. In order to be satisfied that there is no risk to the asset during these periods it is suggested that should	The Applicant's assessment of the likely impact of the Project on this Grade II listed milestone as a result of change within its setting is presented in paragraphs 1.9.92 – 1.9.94 of ES Appendix 7.5: Settings Assessment [APP-142]. It concludes that there a likely effect of 'low adverse' significance which would be short-term and fully reversible, occurring only during the period in which the 275kV cable would be laid within the B4044 Oxford Road as it passes the milestone. This is not a significant effect in EIA terms. The outline Code of Construction Practice (oCoCP) [APP-232 & 233] can be developed under emerging Requirements to include measures for the protection of heritage assets during construction.

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		consent permission be granted for the scheme, a requirement is attached to any order which agrees, prior to commencement, protection measures to be installed during commissioning and again during decommissioning which protect the asset from any damage. These agreed measures must be retained in place until such time that all construction and decommissioning works have been completed. The reason is to preserve the asset in line with both Local Policy and The Act.	
1086	Vale of White Horse District Council	Red House Farm, a grade II listed farmhouse which lies to the north east of the application site is noted as likely to suffer a Negligible Adverse impact because of the development within its setting. This is due to a loss of the character of the agricultural land to which it was historically related, and which still forms part of its wider context. It is acknowledged that there will be no direct impact to the listed building. However, the manner of the agricultural countryside in which the building sits will be eroded by the presence of the proposed PV panels. The way the historic function of the farmhouse and its associated agricultural buildings is understood will be somewhat eroded by the loss of wider agricultural land. It is also noted that grazing is proposed under the panels, but this will not be readily visually understood beyond the 2.2m – 2.3m height of the panels, the fencing, proposed lighting and security systems and other infrastructure which will result in a semi-industrial appearance to the land instead of one of rolling Oxfordshire Countryside. An area of landscape enhancement is proposed to the north of the area in proximity to Red House Farm however this will only provide visual mitigation to some areas in the setting of the listed building. It will remain largely	The Applicant's assessment of the likely impact of the Project on the heritage significance of the Grade II listed Red House Farmhouse is presented in paragraphs 1.9.95 – 1.9.97 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment considers the wider rural setting of the farmhouse, particularly the land to the south. The nearest proposed solar PV panels would be 450 m from the farmhouse, therefore a sizeable buffer of this rural landscape would be retained. The Applicant maintains that the heritage significance of the farmhouse would be barely affected, therefore the correct likely magnitude of impact is 'negligible adverse', resulting in a long-term (time-limited), reversible, 'negligible adverse' effect which is not significant in EIA terms. The Applicant agrees that this harm to the significance of the Grade II listed building should be weighed against the public benefits of the proposed development in accordance with national tests, specifically the test set out in paragraph 5.9.32 of NPS-EN1.

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		exposed and a change to the character of the land with some proposed hedgerow planting along the boundary edge used to soften it. Hiding the scheme behind hedgerows and enclosing PRow with high hedges will also significantly change the way in which the character of the agricultural landscape can be experienced which is not necessarily encouraged as mitigation. Although there is some intervening land remaining as an agricultural buffer to the farmhouse and farm group, the impact goes beyond negligible in my opinion and will have an adverse impact on the manner in which the listed building is understood and gains significance from its wider context. The impact is Minor Adverse and should be outweighed by public benefits as per National and Local Policy Tests.	
1086	Vale of White Horse District Council	Tumbledown Cottage is a non-designated heritage asset identified within the Cumnor Neighbourhood Plan. The ES concludes that the proposals will have a Minor Adverse impact on the significance of this non-designated asset as a result of changes to its wider setting, in particular from the proximity of the panel and large substation which will disconnect it from the historic agricultural land to which its occupants likely once worked following enclosure of the area. It is agreed that the proposals will have a minor adverse effect on the local heritage significance of this asset.	The Applicant's detailed assessment of the likely impact of the Project on the heritage significance of the non-designated Tumbledown Cottage is presented in paragraphs 1.9.131 – 1.9.134 of ES Appendix 7.5: Settings Assessment [APP-142]. It concludes that the heritage significance of the cottage would be slightly harmed as a result of the change within its setting, resulting in a long-term (time-limited), reversible, 'minor adverse' effect which is not significant in EIA terms.
1086	Vale of White Horse	The lack of information about the NGET substation which is anticipated to be very large and sited	Where relevant, the location and likely scale of the National Grid Substation have been included within the assessment of likely

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	District Council	somewhere in or adjacent to the southern parcel substation is a concern. Although it will occupy a smaller area than the fields of panels, the scale of the infrastructure needed is unlike anything else in this area and will likely rely heavily on topography to reduce the impact from some areas. There is a real concern that the impacts will be entirely unmitigated due to necessity if the proposal is granted approval. It should therefore be proposed alongside this scheme in order that it can all be appropriately impact assessed with holistic mitigation used where possible. The Photomontages of Viewpoint 50 show a visualisation of the substations proposed in this area. The indicative scale of the Main and Secondary Substations (Work No.3a and 3b on the Works Plans) are very large structures in an area not characterised by built form of any real scale beyond historic farm buildings. It is clear even from these visualisations that this will result in a significant change to the character of the landscape and its contribution to nearby assets. The impact of this has not been fully assessed as specific plans do not appear to form part of this application. This forms a fundamental part of the overall proposal being a necessary part of the scheme for it to become operational. Likewise, the NGET connection is an absolute necessity for the scheme but there are no details provided other than the anticipated size of the building footprint of 87m x 30m, a 12m height and additional 12.5m gantry heights on an area of land up to 3.8ha in area. This will have a considerable impact on the character of the area that forms the setting of the assets noted above but	impacts and effects presented in ES Appendix 7.5: Settings Assessment [APP-142]. This substation is mentioned in the assessment regarding Red House Farmhouse (paragraphs 1.9.95 – 1.9.97), Upper Whitely Farmhouse (paragraphs 1.9.98 – 1.9.100) and also Tumbledown Cottage (paragraphs 1.9.131 – 1.9.134).

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		heritage impact assessment from detailed proposals has not been done.	
1086	Vale of White Horse District Council	Heritage impacts are consistently concluded as being reversible. Paragraph 1.10.6 of Appendix 7.5: Settings Assessment for example concludes "All effects would be fully reversible." This is on the basis that the proposal is 'temporary' in nature for a period of 45 years. Discussion and debate on how much weight should be given to this 45-year period should form part of a robust balancing exercise. This period would mean that an entire generation will experience the proposed semi-industrial appearance of the landscape as the character which forms the setting of these assets. This would also result in a large proportion of the population not experiencing the reinstatement of the agricultural landscape in the setting of these again in their lifetime. For these reasons it is recommended that it should be carefully considered how much weight 'temporary' should be given and whether assessment should be as if the proposed works will be permanent in terms of how heritage assets are experienced by a generation. This should also be considered against the proposed environmental and bio-diversity enhancements which are likely to become permanent features in the landscape.	Reversibility is a consideration that is commonly taken into account when planning decision-makers are considering impacts and effects on the environment. For example, paragraph 2.8.352 of the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) which deals with seascape and visual effects arising from offshore wind projects states '<i>Where adverse effects are anticipated either during the construction or operational phases, in coming to a judgement the Secretary of State should consider the extent to which the effects are temporary or reversible</i>'. The assessment of likely impacts and effects of the Project resulting from changes within the settings of heritage assets is presented in ES Appendix 7.5: Settings Assessment [APP-142]. In this document, the reversibility of effects is noted but does not actually form part of the assessment process, i.e. the assessed magnitude of impact and hence the level of effect do not take account of the reversibility or irreversibility of the impact. The word 'temporary' does not appear in the assessment of likely impacts and effects resulting from changes within the settings of heritage assets presented as ES Appendix 7.5: Settings Assessment [APP-142]. In that document the impacts and effects are described as 'long-term'. Within ES Chapter 7: Historic environment [CR1-003] the term 'time-limited' is also used. The use of the terms 'temporary' and 'time-limited' should be seen in the context of national planning policy, specifically paragraph 2.10.66 of NPS-EN3 which addresses the project lifetime of solar

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			farm developments and which states '<i>Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.</i>' The preceding paragraph of NPS-EN3 refers to an upper limit of 40 years as typical (for solar farm developments). Therefore, it is clear that national policy regards impacts and effects arising from time-limited consents for solar farms as 'temporary'. The Applicant agrees that some of the proposed environmental mitigation measures may become permanent features in the landscape, specifically any new hedgerows that are planted as part of the mitigation for likely landscape and visual effects. Any new hedgerows would thus become part of the setting of heritage assets and would also be a 'new' element of the historic landscape. However, the removal and adjustment of field boundaries is a continuous process as landscape change over time. Major changes can occur such as the change from the medieval open-fields to enclosure landscapes such as those seen across most of Oxfordshire, but most change is much more gradual. The insertion of new hedgerows required for the proposed development is unlikely to result in a significant impact on heritage assets or on the overall character of the historic landscape.
1086	Vale of White Horse District Council	There is an assessment (ES Chapter 20) of the cumulative impacts possible from nearby permissions and proposals not yet approved. For VWHDC this is in the context of the separate Solar Farm that has been proposed near to Red House Farm. Without an approved scheme, it is difficult to quantify what weight should be given to this, but it is agreed	The assessment of cumulative effects of the Project on heritage assets with regard to the Red House Farm solar farm is presented in paragraphs 7.11.68 – 7.11.83 of ES Chapter 7: Historic environment [CR1-003]. This assessment concludes that the cumulative impact on the Grade II listed Red House Farm would be greater than the impact of the Project on its own. The assessment found that the cumulative effect would be 'minor

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		that the impact to the listed building would be higher than identified owing to further reduction in remaining agricultural landscape that contributes to its heritage significance. A careful balanced judgement is therefore required on how much weight to give to potential cumulative impacts and, where relevant, weight given to the importance of remaining open undeveloped agricultural land and space.	adverse', whereas the effect of the Project on its own would be 'negligible adverse'. The main reason for the cumulative effect being greater is that the Red House Farm solar farm would take up most of the 450 m buffer between the listed building and the Project Site. The two solar farms would appear as a single larger scheme extending close to the property boundary of the listed farmhouse.
1086	Vale of White Horse District Council	It is also questioned why onsite battery storage is not proposed as part of the solar project as it is noted in submitted documentation that this is likely to be necessary to provide or connect to battery storage in the wider area to support the actual net zero potential for the generation of the scheme. Such elements need to be considered holistically and delivered in a more land-efficient manner to ensure the impact on heritage assets and the historic character of the landscape is reduced.	Battery storage is not needed as part of the Project. The battery storage proposed to support the Project is available at the Cowley Energy Super-Hub. The relationship with that storage and the approach to shared energy infrastructure is considered in the response to the main Relevant Representations.
9. Plants Trees and Flora			
RR-1086-22	Arboricultural Survey.	The site and its surroundings contain trees, hedgerows, and designated Ancient Woodland that collectively contribute positively to the rural character of the area. The trees are not currently protected by way of Tree Preservation Order (TPO) or within Conservation Area designation. VWHDC is satisfied that the outlined tree survey methodology, which aligns with BS5837, is appropriate in principle. However, a comprehensive survey does not appear to be provided for the Southern Site Area or Lower Cable Route (Section 5). As a result, it is not possible to provide	During detailed design targeted surveys of areas where clashes are likely between the proposed scheme and trees/ hedgerows, will be carried out in order to fully assess the impacts of the proposed scheme. A Veteran Tree Survey has been carried out across the site which identified and located over sixty veteran trees and three veteran tree groups. These trees and their veteran tree buffer will be shown on all subsequent plans. A 15m buffer around all ancient woodlands has been applied following current UK guidelines.

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		informed comments on the current layout proposals due to insufficient information. It is noted that the Ancient Tree Inventory indicates the potential presence of at least one tree of veteran status within the site and its surroundings. This should be accounted for in the final tree survey. The current plans suggest a minimum buffer zone of 15 metres is proposed for the designated ancient woodlands adjacent to the site. It is recommended that the Forestry Commission (FC) be consulted to determine whether this minimum buffer zone is adequate to protect this irreplaceable habitat. Approval of the design layout should not be considered feasible until the necessary surveys are made available. The Arboricultural Impact Assessment identifies potential conflicts with trees (Sections 5.16 5.17), and this information should inform the design, specifically, the placement of substations, cabling, and access road etc, to ensure the retention of high-value trees. While the overall arboricultural methodology outlined in the Arboricultural Method Statement (AMS) is acceptable in principle, it is not appropriate for this matter to remain unresolved as is suggested in section 6.3 of the AMS. In accordance with BS5837:2012 (Trees in relation to design, demolition and construction), the design, construction methods, and implementation of tree protection measures must be agreed upon prior to finalisation of the design layout and the commencement of works.	Targeted surveys, AIA and AMS will be produced during detailed design as the impact of the proposed cable route cannot be assessed until the route of the cable is known. The retention of trees has been a material factor when designing the proposed scheme and the retention of all high value trees will be sought. Targeted AIA/ AMS will be produced during detailed design. These will provide more detail on tree retention/ removal and proposed protection/ damage mitigation for any works within each targeted location.

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10. Cumulative Impacts			
RR-1086-17	Approach of Cumulative Assessment	The cumulative assessment has not considered certain schemes that should have been assessed.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057]. This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment and selection of cumulative schemes with statutory and non-statutory consultees. The Applicant deems the approach taken to the cumulative assessment that has been carried out as being suitable and appropriate for the proposed development.
11. Local Ecology and Nature			
RR-1086-19	Impacts to Ancient Woodland.	Adverse impacts on Ancient Woodland are unacceptable unless there are wholly exceptional reasons, and a suitable compensation strategy exists. PH are identified under s41 of the NERC Act 2006 as being of principle importance for the purpose of conserving and enhancing biodiversity. Adverse impacts should be avoided wherever possible, and opportunities to enhance them taken.	The Project has been designed to avoid areas of ancient woodland such that none occur within the order limits. Measures would be put in place to ensure that a minimum 15 metre buffer is retained between ancient woodland and construction areas. Appropriate fencing in accordance with BS 5837, would be erected around the 15 metre buffer to prevent access by people, materials or machinery to avoid compaction of soils or roots and to avoid any accidental damage, as per Natural England guidance.
RR-1086-20	License applications.	The development will have impacts on protected and priority species. Where development activities require a derogation licence from Natural England to proceed lawfully, the Secretary of State should be satisfied that such a licence is likely to be granted when considering any relevant tests of derogation.	Draft license applications will be submitted to Natural England for relevant species, in order to receive Letters of No Impediment (LONI).

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	Skylark mitigation.	Measures intended to avoid, mitigate, and compensate for impacted species should be likely to succeed and be robustly secured. VWHDC remains concerned that the proposed approach to skylark compensation, through the provision of interspersed skylark plots, is unlikely to be successful. Skylarks are an open-ground nesting species with strong anti-predator behavioural tendencies which mean that they are unlikely to utilise plots in proximity to structures, trees or boundaries. The placement of skylark plots within array complexes (close to individual panels) means that those plots are unlikely to be used for breeding.	The plots are not intended to be used as mitigation for breeding skylark territories <i>per se</i> . Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity of species that might nest either within the archaeological areas which are spread throughout the Project site and which will be managed specifically for birds (both wintering and breeding) or in fields near to the Project site. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species.
RR-1086-21	Biodiversity Net Gain.	NSIPs are not currently subject to mandatory BNG. However, a net positive biodiversity outcome should be targeted. Solar schemes generally tend to offer the ability to provide BNG onsite, where the original habitat is of low value. In this case, the transition from arable land to grassland underneath solar panel arrays is likely to lead to a gain. However, due to the impacts of arrays on availability of light, rainfall, humidity and management, it is recommended that a precautionary approach is taken when considering the value of grasslands that can be created and maintained as part of the proposals. The Secretary of State should be content that a thorough and evidenced BNG assessment has been completed and that the establishment and ongoing maintenance of habitats is secured robustly. Should VWHDC be required to take on monitoring or enforcement functions, suitable financial contributions should be secured to ensure that this is possible.	The calculation of the project's Biodiversity Net Gain (BNG) is set out in the Biodiversity Net Gain Assessment, provided in Volume 3, Appendix 9.13 [APP-162]. BNG for Nationally Significant Infrastructure Projects is expected to become a requirement from late November 2025, expected to be set at 10% BNG. The outline maintenance and monitoring of BNG landscape elements of the site is set out in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235]. The OLEMP is part of the project's embedded mitigation and will be secured in the Development Control Order (DCO) [AS-009].

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1086	Draft Development Consent Order	Host authorities will provide detailed comments on the draft DCO. The key issues for focus will include the scope of the authorised development, the schedule and drafting of requirements. VWHDC expect their views on the drafting and approvals process for DCO requirements to be given significant weight in their role of ensuring that the impacts upon our local environment and communities are minimised, and as an approving and enforcement authority.	The Applicant welcomes feedback from VWHDC on the draft DCO through the Examination Process, and acknowledges its views given its role as an approving and enforcement authority.
12. Community Benefits			
1086	Community Benefits Package	The host authorities are working with affected parishes on a suitable mechanism for collecting and implementing a community benefit fund as a means by which to secure benefits if the project receives planning consent. The amount currently being offered by the Applicant (£200,000 p/a) is inadequate for a development of this scale. Negotiations on a community benefit agreement (CBA) are therefore expected to continue alongside the planning process and will be supplemental to any section 106 agreement required to mitigate the adverse impacts of development.	The Applicant acknowledges the concerns and notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant. The fund will be part of a Community Benefits package outside the scope of the DCO application, to be agreed with the relevant local authorities. (See Planning Supporting Statement paragraphs 3.5.24 and 8.4.71 APP/7.1). The Applicant has held discussions with Parish, District and County Councils and has now agreed to an annual fund payment of £525 per MW, £441,000. This will deliver £16,500,000 over the 37.5 year life of the project, before indexation. The Scottish figure of £5000 per MW is applicable to onshore wind turbines, not solar farms.



Botley West Solar Farm

Applicant Responses to Relevant Representations - West
Oxfordshire District Council [RR-1102]

June 2025

PINS Ref: EN010147
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I. Applicants' Comments in response to the Relevant Representations submitted by West Oxfordshire District Council [RR-1102]

Table II-1: Applicants' Comments on Relevant Representations

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
1. Decommissioning			
RR-1102	Length of permission	42 years is not 'temporary' – it is a long time, and should be considered permanent – including in the assessment of impacts.	Solar farms are generally consented on the basis that they will be time-limited in their operation and pursuant to NPS EN-3 paragraph 2.10.65 are therefore "described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed." NPS EN-3 also recognises that an upper limit of 40 years is typical, but that applicants may seek consent without a time-period or for differing time-periods of operation (paragraph 2.10.66). The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any Project. Consent for the Project is sought for 42 years from commencement to de-commissioning and removal. The development is not proposed to be permanent, and the lifetime of the Botley West Project aligns with other similar solar farm projects of this scale and type, and which have been consented under the NSIP regime. The Project, as assessed in the EIA process and described in the Environmental Statement, takes this duration into account.
RR-1102	Decommissioning Plan	There needs to be more clarity and certainty on the length of the permission – regardless of interim re-powering / replacement panels – and more certainty on the costs and funding sources, binding agreements, on-going management and a bond for decommissioning, especially as the developer is based overseas and it seems unlikely any public agency would	The Applicant has the financial means to acquire the required rights and build the Project as set out in the Funding Statement [APP-022]. With respect to financing of the decommissioning, if made, the draft Order [AS-009] would require the decommissioning of the Project to be carried out in accordance with a Decommissioning Plan (DP) (requirement 14, Schedule 2). An outline DP (oDP) [APP-236] has been prepared as part of the DCO application. This provides the outline mitigation measures to be adhered to during decommissioning. The DCO includes a requirement to prepare and

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		be prepared to underwrite the decommissioning costs.	approve the DP and for it to be substantially in accordance with the oDP, and for the approved DP to be implemented. The Applicant is aware of its obligations in the draft DCO with respect to decommissioning and will need to plan for decommissioning of the Project if the Order is made – and any undertaker would similarly plan for the need for it to comply with the obligations on it under the DCO (for example, and the operator will set aside funds during the operation of the proposed development to meet the cost of decommissioning). Further, the requirement will be enforceable against anyone who holds the benefit of the Order at the time that the Project is decommissioned and failure to comply with the requirement would be a criminal offence pursuant to section 161 of the Planning Act 2008. The Proceeds of Crime Act 2002 also acts as a further deterrent to such a breach. The elements of the installed solar farm represent a valuable asset for the Applicant, so it would be in its interests financially, to decommission the site in order to recycle or sell those components. Further, if the undertaker of the Order went into liquidation, its assets would be sold off to fund the decommissioning under the legal requirement. The Applicant therefore does not consider a bond to be necessary and we note that similar solar NSIP projects have not always required financial securities, and PINs and the SoS have accepted that a decommissioning Requirement is sufficient. For example, similar arguments were made in the Cleve Hill examination, and were accepted by the ExA in its report, with which the SoS agreed. In particular, see para 12.3.50 which states that “Without clear precedent or Government guidance, we see no basis to justify a financial bond secured by requirement in the DCO. Moreover, we do not believe that such a requirement would meet the relevant law and policy on the drafting of requirements”. On Sunnica, the SoS’s decision recorded that several interested parties also raised issue with the Applicant’s ability to fund the full delivery cost of the Proposed Development, including decommissioning [ER 7.5.124 et seq.].

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			However, consistent with all made solar DCOs to date, the SoS did not consider any bond or other form of security necessary to include in the Order. On Mallard Pass, the Examining Authority said [ExAR 7.4.73] "We do not consider it necessary for any further controls to be imposed on the timeframe for the decommissioning programme..." and "Whilst there were suggestions by Interested Parties for provision to be made for a financial bond, consistent with the other made DCO's for solar projects we do not consider this to be necessary given the controls that would already be in place via Requirement 18 of the DCO".
		The promised hedgerows meant to screen the development will require ongoing maintenance. Without strict oversight, they could be left to wither and die, failing to serve their intended purpose. There will be additional substantial ongoing management costs that need to be addressed.	The Outline Landscape and Ecology Management Plan [APP-235] presents the outline planting proposals for the land within the DCO, including the planting schedules and overall maintenance regime. This will be further developed into a detailed Landscape and Ecology Management Plan for the operational phase of the project, including legacy landscape that will remain in situ upon removal of the solar farm. It is expected that the management costs, funding streams and required commitments to these maintenance regimes will be managed as part of the Engineering, Procurement and Construction (EPC) process. It is intended that green infrastructure, such as hedgerows that are planted, will remain in perpetuity after decommissioning and the land is handed back to the owners, and subsequent maintenance. This is, however, not in the Applicant's control.

2. Cumulative Impacts

RR-1102-3	Continuous Cumulative Impacts along PROWs and Roads	Some PROWs have a viewpoint at one end only, therefore ignoring cumulative impacts. The same applies to the assessment of cumulative impacts on roads.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships [APP-057]. This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. The Applicant deems the approach taken to the cumulative assessment that has been carried out as being suitable and appropriate.

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3. Planning Policy			
RR-1102-4	Site selection, alternatives considered and existing baseline	National Policy Statements make it clear that applicants should provide a description of the reasonable alternatives studied, which are relevant to the proposed development and its specific characteristics, giving an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. Applicants are obliged to include information about the reasonable alternatives they have studied in their Environmental Statement, including an indication of the main reasons for the choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. The applicant describes the process of site selection including reasons for focusing on the South East, the identification of grid connection opportunities and the availability of land. Having been offered sufficient land to meet their initial requirement for 250Ha of land 15km from the proposed connection to the NGET substation, a decision was made to include a significantly larger area of land for the project, defined now as the northern, central and southern areas. An iterative design process was then undertaken to identify final scheme. The applicant explains that the site has been selected on the basis that planning and environmental constraints can be avoided or minimised, including impacts on	The Applicant has addressed 'alternatives' in accordance with policy. Chapter 5 of the ES [APP-042], sets in detail the process the Applicant went through before confirming its choice of location, size and layout. The authority asserts that the Applicants' '...design and location of the proposal has been constraints led, rather than being shaped by an understanding and appreciation of the local topography and features of the landscape or a vision as to what could be achieved...' The Applicant has been aware of the need to observe and have regard to 'constraints' within the area. It would be perverse not to have regard to this. However, this was not at the expense of an understanding and appreciation of the landscape or vision for the site in the long term. The Applicant is very aware that one of the environmental effects arising from such renewable technology, is landscape and visual effects. The whole design process has been sensitive to that, and the planning and landscape leads associated with the Project have made clear recommendations to the Applicant where it was felt an unacceptable visual impact would arise. At a micro level, this included moving panels and other electrical infrastructure away from sensitive receptors, or high ground that could not easily be screened. At a macro level, the Applicant knew this was a significant opportunity to create a positive long-term landscape and ecology legacy for the area. The Landscape, Ecology and Amenities Area Plan [APP-228], illustrates this legacy and includes a strategic scale landscape and ecology vision for the area, with improved public access and areas dedicated for educational use as well as areas for food growing.

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		landscape, heritage and cultural assets, that permanent adverse effects upon best and most versatile agricultural land can be avoided, that significant biodiversity gains can be secured and that the site is located beyond key landscape and environmental designations. The applicant makes reference to a high level constraints plan used to understand site sensitivities in planning and environmental terms, which provided an opportunity to identify mitigation measures, such as the planting of native species to enhance existing habitat and ability to enhance the landscape and provide screening for the project. To this extent, West Oxfordshire District Council consider that the design and location of the proposal has been constraints led, rather than being shaped by an understanding and appreciation of the local topography and features of the landscape or a vision as to what could be achieved. The layout of the proposal avoids sites designated for their historic and ecological value and imposes buffer zones in an effort to protect the integrity and setting of important landscape, ecology and heritage features, but then seeks to maximise the extent of the development throughout the remaining landscape with little explanation of the iterative design approach beyond the narrow view of the mitigation hierarchy. WODC supports, in principle, the development of renewable and low carbon energy developments in the	A careful approach has also been adopted in relation to the setting of heritage assets, and this is considered further at Section 5 of this document.

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		district, provided they are located and designed to minimise any adverse impacts, with particular regard to conserving the District's high valued landscape and historic environment. In assessing proposals, the council has regard to the following local issues which will need to be considered and satisfactorily addressed: • Impacts on landscape, biodiversity, historic environment (including consequent potential impacts on the important local tourism economy and sense of local pride), agricultural land, residential amenity, aviation activities, highway safety and fuel/energy security, including their cumulative and visual impacts; • Environmental enhancements, in addition to those required to mitigate and compensate any adverse impacts, will be sought, especially where they will contribute to Conservation Target Areas and Nature Improvement Areas; • potential benefits to host communities (including job creation and income generation).	
RR-1102-6	Green Belt and VSC	A significant proportion of the development site is located within the Oxford Green Belt. When considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in

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		harm to the Green Belt when considering any application for development. The applicant indicates that harm caused by reason of inappropriateness of the Project has been assessed and whilst the applicant identifies conflicts between the proposal and the purposes of the Green Belt, on balance these are considered by the applicant to be limited. Impact upon openness of the Green Belt has also been assessed, but the applicant considers the impacts are limited and reversible. WODC do not agree. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Any suggestion about the temporary nature of the scheme should be considered in this context. The proposed development is stated to be for a period of 37.5 years. This is a substantial length of time which during which the openness of the Green Belt would be compromised, thus undermining the permanence for a significant amount of time. The Applicant considers that on balance the harm to Green Belt is outweighed by the Very Special Circumstances (VSC) for the proposal, including the 'temporary' nature of the development, the significant and necessary contribution to renewable energy targets, increased access to land within the Green Belt, careful landscape screening, and permanent and significant	Appendices 1 to 7. The case for development within the Green Belt is made in Appendix 8. In addition, it should be noted that with the publication of latest Planning Practice Guidance (PPG) on Green Belts (27 February 2025), this alters the way in which some of the Green Belt tests should be applied. In particular, Green Belt purpose A, B and D, now clarifies that is towns NOT villages that should be considered when assessing impact upon Green Belts. This will affect the way in which Green Belt policy should be applied at local level in relation to the Applicants Project. The Applicants' assessment of its effect upon the Green Belt remains unaltered except in respect of Green Belt purpose B – to prevent neighbouring towns from merging into one another. Here the Applicant is of the view that conflict is less than previously assumed. In their analysis, the Applicant had identified that the narrowest point of the Green Belt which the project affected, was between Bladon and Begbroke. Under the new guidance this analysis is largely redundant insofar as both these settlements are 'villages' and these are now effectively excluded from assessment in the latest guidance. The nearest 'towns' now affected by the Project are Woodstock to the north, Witney to the west, Oxford to the east and Abingdon to the south. Given the much more significant areas of openness between these towns and the Project, the threat of merging is diluted even further. Notwithstanding, Section 104 of the Planning Act 2008 requires the Secretary of State to have regard to the NPS and in essence decide the application in accordance with the NPS. Importantly NPS EN1, 4.2.16 and 4.2.17 makes clear that the Secretary of State will take as a starting point that CNP Infrastructure, such as Botley West, will meet any Green Belt VSC test.

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		beneficial effects to the landscape and biodiversity net gain.	
RR-1102-7	Green Belt Policy	WODC questions the VSC case for development in the Green Belt. The applicant considers the development to be unrestricted, temporary and reversible and that such factors should be considered as part of the VSC for the solar farm development. The Green Belt serves a number of purposes including to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns from merging into one another, to assist in safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns and to assist in urban regeneration by encouraging the recycling of derelict and other urban land. The Green Belt in West Oxfordshire performs an important role and in its current undeveloped state performs effectively when tested against the above purposes of the Green Belt.	The Planning Supporting Statement (PSS) [APP-225] sets out the legislative and policy context applicable to the proposed development, as well as the Applicant's position in regard to the extent to which the proposed development complies with relevant planning policy at a local and national level. The Applicant's compliance with local and national policy is set out in the tables in Appendices 1 to 7. The VSC case in particular is set out in detail in Appendix 8.

4. Landscape and Visual Impacts

RR-1102-5	West Oxfordshire District Council consider the proposed location to be particularly sensitive due to the character and quality of landscape, the concentration of significant heritage assets, the value of soil resources and the presence of important ecological resources. There are opportunities to enhance landscape, ecology and heritage assets within the	The potential impacts of the Project upon all landscape and visual receptors, within the 5 km Study Area, including Public Rights of Way (PROW), have been assessed within the submitted Landscape and Visual Impact Assessment (LVIA) [APP-045]. The Applicant acknowledges that views of the solar farm will remain at section 8.9 of the LVIA [APP-045]. However, through the proposed landscape mitigation shown on Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], these effects on views would be

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		project area but it is not clear how an iterative design approach recognises such opportunities, other than where interventions are proposed to mitigate the visual impacts of the proposal and to screen it from view.	minimised, in line with the requirements of NPS EN-1 and NPS EN-3 (see response to RR-870-005 and 0793-005, above). The effects of the Project on the setting of the Blenheim Estate World Heritage Site and other historic assets have been assessed within ES Chapter 7 - Historic Environment [APP-044]. The existing PROW network would be retained and managed during the construction of the project in accordance with the outline PROW Management plan [APP-232]. They would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. As such, the public's access would not be restricted. For more information on effect on the public rights of way network see ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the solar farm is proposed will similarly change. The effect on local wildlife and other important ecological considerations is assessed in ES Chapter 9 - Ecology and Nature Conservation [APP-046]. The Applicant has adapted the extent of the solar farm and increased distances from potentially sensitive receptors. The Applicant has also increased the amount of landscape mitigation, thereby minimising adverse effects on landscape and visual receptors, in line with the guidance in National Policy Statement EN-1 and EN-3 (see response to RR-870-005 and 0793-005, above). Hedgerows have been proposed as part of the landscape mitigation proposals, as shown on the Illustrative Masterplan [APP-062]. These will be managed to a height of 3m to 4m, as specified in the outline LEMP. Existing hedgerows will be reinforced and managed to a height of 3m to 4m. This will be sufficient for most close views to be screened. More distant views on rising land will be available and this is acknowledged in the LVIA There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the

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			Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology set out in sections 8.4 and 85 of the LVIA [APP-045] to support those judgements. All the landscape consultants that have worked/are working on the project are Chartered Members of the Landscape Institute and experienced in the assessment of solar farms within this type of landscape.
RR-1102-12	Landscape Character	The landscape character of the area proposed for development is attractive rural countryside, often with wide sweeping views and that is sensitive to change. WODC considers that the proposed solar farm would result in a fundamental change to the landscape character of the area which would be contrary to our objectives for planning development in West Oxfordshire.	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km Study Area for the assessment, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP-045]. The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan [APP_062]. The environmental effects of the Project are considered reversible, unlike for those arising from residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed. The Landscape and Visual Impact Assessment [APP-045], includes an assessment of cumulative effects at section 8.11. The Parish of Cumnor, in common with other areas within which the Project, is located in a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation scheme. As shown on the Illustrative

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			Masterplan [APP_062] and the Landscape, Ecology and Amenities Plan [APP_228]. The perceptual characteristic of tranquillity is considered in the LVIA. Thirty-three photomontages have been produced as part of the application [APP-072 to 080]. These demonstrate the impacts of the Project and illustrate that the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours. The existing public rights of way network would be retained and managed during the construction of the project in accordance with the outline Public Rights of Way Management plan [APP-232]. They would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. As such, the public's access would not be restricted. For more information on effect on the public rights of way network see ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. As the response to RR-0103-003 explains, landscapes are ever-changing, particularly areas of agricultural land. The publicly available views of the land where the Project is proposed will similarly change. The proposed mitigation measures such as planting will reduce effects identified in the ES. The effect on wildlife is considered in ES Chapter 9 - Ecology and Nature Conservation [APP-046], outlining both negative and positive impacts to ecology receptors. The Applicant welcomes the acknowledgement in this relevant representation that significant steps have been taken to address the respondent's concerns, while noting that concerns still remain. The Landscape and Ecological Management Plan (LEMP) is outline only. A detailed LEMP is secured by requirement [APP-235] of the DCO and will be developed and agreed with all three local planning authorities. Separation between villages is a spatial planning matter and is considered in the Planning Supporting Statement (PSS) inc Green Belt Case [APP-225].

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RR-1102-13	Topography	Further consideration of the constraints and opportunities and site topography in relation to the project area, should guide further revisions to the design and layout of the proposed development. Such revisions could result in a reduced scale of project, but would help to minimise the magnitude and significance of effects on a sensitive environment and leave a positive landscape and ecological legacy beyond the lifetime of the development.	The impacts of the Project upon landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the Landscape and Visual Impact Assessment [APP-045]. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The 55 Representative Viewpoints were consulted on and agreed with all host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045]. Wytham Woods is a privately owned woodland, with access by appointment. As such, there is no general public access. Although the Project will be partly visible in views from more open parts of the woodland and at the edge of it, no significant effects have been identified from Representative Viewpoints within or at the edge of Wytham Woods. Including Representative Viewpoints 42, 43 and 44. A photomontage (winter and summer) was completed to illustrate possible effects from Representative Viewpoint 42.

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			The Landscape and Visual Impact Assessment [APP-045] has identified significant effects upon visual amenity, particularly from Public Rights of Way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA [APP-045], at a very local level or where it would not be possible to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape. The solar PV arrays have a maximum height of 2.3m and follow the natural contours of the local landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located. The ecological effects of the proposed solar farm on Wytham Woods SSSI and Wychwood are assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. The effect on the setting of Oxford as a historic asset is assessed in ES Chapter 7 - Historic Environment [APP-044]. Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that <i>"infrastructure to achieve our energy objectives national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation"</i> (NPS EN-1, paragraph 3.3.63). The NPS explains further that <i>"projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero"</i> (NPS EN-1, paragraph 4.1.7). The residual landscape and visual effects, after the proposed mitigation do not present an unacceptable risk to the matters listed. NPS EN-3 explains that "Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation of

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			the site" (NPS EN-3, paragraph 2.10.42). The physical detailed effects on the public rights of way network are considered in ES Chapter 17: Agricultural Land Use and Public Rights of Way [APP_054]. NPS EN-3 encourages Applicants to "minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape" (NPS EN-3, paragraph 2.10.43). It also requires Applicants to "consider and maximise opportunities to facilitate enhancements to the public rights of way and the adoption of new public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights or the creation of permissive paths)" (NPS EN-3, paragraph 2.10.44). As detailed above, NPS EN-3 encourages Applicants to minimise the visual impacts of developments. This has been achieved through the production of the Illustrative Landscape Masterplan [APP-062]. This has considered and minimised landscape and visual impacts as set out in NPS EN-3.
5. Historic Environment			
1102	West Oxfordshire District Council	WODC consider that the applicant has identified the relevant heritage assets within and in proximity to the scheme that could be impacted by the development. The applicant also adequately explains the significance of the heritage assets that could be impacted by the proposal.	The Applicant welcomes WODC's comment that relevant heritage assets have been identified and that the heritage significance of these assets has been adequately explained within the application documents.
1102	West Oxfordshire District Council	The applicant's assessment of effects in relation to the historic environment confirms that no significant effects in respect of any aspect of the historic environment have been identified within the Environmental Statement. The effects	The Applicant respectfully disagrees with WODC's statement that the likely significance of impacts on the historic environment has been played down. The Applicant's assessment of likely impacts and effects of the Project in respect of the Blenheim Palace World Heritage Site is presented in the Heritage Impact

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		on designated heritage assets, including the Blenheim Palace WHS, as a result of change within their setting have been assessed by the applicant as not significant. The effects on buried archaeological remains resulting from physical impacts have also been assessed by the applicant as being not significant. The cumulative effects assessment examined likely impacts on designated heritage assets as a result of change within their setting and the impacts on the character of the historic landscape. The applicant concludes that there are no significant cumulative effects from the Project alongside other projects/plans. WODC do not agree with these conclusions and consider that the applicant has played down the likely significance of impacts arising from the proposed development. Notwithstanding the conclusions that the applicant makes through their own assessment, it is the view of WODC that there are residual harmful impacts that are likely to arise from the project on heritage assets that are of international and national importance and that these impacts should be regarded as significant. This includes the impact on the settings of the heritage assets including Blenheim	Assessment (ES Appendix 7.4 [APP-141]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England. The Heritage Impact Assessment identified a likely 'minor negative' impact on one attribute (Attribute 7) which contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. The overall assessment of likely impacts and effects of the Project on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003]. The likely effect on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). The impact would be long-term (time-limited) and fully reversible. The sensitivity/value of the WHS is determined as 'very high', resulting in a likely effect of 'minor adverse' significance, which is not significant in EIA terms. The Applicant notes that in their Relevant Representation (RR-0398), Historic England does not disagree with the Applicant's assessment of likely impacts and effects of the Project in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4 [APP-141]), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment [CR1-003]. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS.

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		Palace World Heritage Site, Grade 1 Listed Buildings at Church Hanborough and Cassington, Scheduled Monuments at Sansom's Platt and Bladon Camp, Conservation Areas at Church Hanborough and Bladon and buried archaeology throughout the site. The maintenance of the Outstanding Universal Value of Blenheim Palace World Heritage Site and its setting is a key objective and therefore needs to be given particular consideration through the examination of the solar farm proposals.	The Applicant also notes that in their Relevant Representation [RR-0413], ICOMOS-UK state that 'the proposed Botley west Solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map 'Character of Setting of WHS' on page 50 of Appendix III of the Management Plan'. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the Outstanding Universal Value (OUV) of the UK World Heritage Sites and their settings is one of their key objectives. The detailed assessment of likely impacts and effects of the Project on the heritage significance of designated heritage assets is presented in ES Appendix 7.5: Settings Assessment [APP-142]. The assessment of the likely impact of the Project on the Grade I listed Church of St Peter and St Paul at Church Hanborough is presented within paragraphs 1.9.27 – 1.9.31 of that document. The assessment included a review of visualisations from Viewpoints 27 and 38 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 27 are presented as Figures 8.312 – 8.315 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 5 of 9 [APP-076]. The visualisations from Viewpoint 38 are presented as Figures 8.336 – 8.339 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 7 of 9 [APP-078]. The Applicant's detailed assessment presented within paragraphs 1.9.27 – 1.9.31 of ES Appendix 7.5: Settings Assessment [APP-142] concludes that the construction of the Project would not preclude any existing views towards the church, and the spire would remain visible as at present. However, elements of the Project would be visible in the foreground and middle ground in such views and consequently the setting of the church as experienced in these views would change from the predominantly rural situation as at present. The heritage significance of the church would be 'barely harmed', resulting in a 'negligible

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			adverse' magnitude of impact that would be long-term (time-limited) and fully reversible. For the magnitude of impact to be greater than 'negligible adverse', the heritage significance of the church would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. The greatest part of the heritage significance of the church lies in its historical and evidential values, with the potential recovery of information retrieved through examination of the fabric of the building or relevant documentary sources. These values would not be affected in any way by the Project. The setting of the church makes a reasonable contribution to its heritage significance, especially the enclosing churchyard and the associated burial monuments. The relationship between the church and the churchyard would not be affected by the Project. In their Relevant Representation [RR-0398], Historic England acknowledge that any harm to the heritage significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough would be less than substantial with regard to the terminology used in national planning policy. As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test. The detailed assessment of the likely impact of the Project on the heritage significance of the Grade I listed Church of St Peter at Cassington is presented within paragraphs 1.9.32 – 1.9.34 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment included a review of visualisations from Viewpoints 42 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 42 are presented as Figures 8.348 – 8.351 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 8 of 9 [APP-079]. The Applicant's detailed assessment presented within paragraphs 1.9.32 – 1.9.34 of ES Appendix 7.5: Settings Assessment [APP-142] concludes that the construction of the Project would not preclude any existing views towards the church and the spire would remain visible as at present. However, elements of

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			the Project would be visible in behind and adjacent to the church tower in some views and consequently the setting of the church as experienced in these views would change. The heritage significance of the church would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be time-limited and fully reversible. For the magnitude of impact to be greater than 'negligible adverse', the heritage significance of the church would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. The greatest part of the heritage significance of the church lies in its historical and evidential values, with the potential recovery of information retrieved through examination of the fabric of the building or relevant documentary sources. These values would not be affected in any way by the Project. The setting of the church makes a reasonable contribution to its heritage significance, especially the enclosing churchyard and the associated burial monuments. The relationship between the church and the churchyard would not be affected by the Project. In their Relevant Representation [RR-0398], Historic England acknowledge that any harm to the heritage significance of the Grade I listed Church of St Peter at Cassington would be less than substantial with regard to the terminology used in national planning policy. As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test. The detailed assessment of the likely impact of the Project on the heritage significance of the Scheduled Monument at Sansom's Platt is presented within paragraphs 1.9.4 – 1.9.14 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment included a review of visualisations from Viewpoints 9, 10 and 11 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 9 are presented as Figures 8.264 – 8.267 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 2 of 9 [APP-073]. The visualisations from Viewpoint 10 are presented as Figures 8.268 – 8.271 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 2 of 9 [APP-073]. The visualisations

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			from Viewpoint 11 are presented as Figures 8.272 – 8.275 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 3 of 9 [APP-074]. The Applicant's detailed assessment presented within paragraphs 1.9.4 – 1.9.14 of ES Appendix 7.5: Settings Assessment [APP-142] concludes that the likely impact of the Project would be greatest at the time of construction, reducing over time as new planting designed to screen views of the proposed development reaches maturity. The heritage significance of the Scheduled Monument would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be long-term (time-limited) and fully reversible. For the magnitude of impact to be greater than 'negligible adverse', the heritage significance of the Scheduled Monument would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. The greatest part of the heritage significance of the Scheduled Monument lies in its evidential values, with the potential recovery of information retrieved through examination of the buried archaeological features. These values would not be affected in any way by the Project. The setting of the Scheduled Monument makes some contribution towards its heritage significance, especially the presence of the Roman road (Akeman Street) which is directly adjacent to the Scheduled area. The relationship between Akeman Street and the Scheduled Monument would not be affected by the Project. The Scheduled Monument known as Bladon Camp was scoped out of the detailed assessment of likely impacts and effects of the Project on the heritage significance of designated heritage assets (ES Appendix 7.5: Settings Assessment [APP-142]). This is because it is totally surrounded by an extensive area of woodland which precludes any views from or towards the Project Site. In their Relevant Representation [RR-0398], Historic England (who are the principal consultee with regard to the likely impacts of the proposed development on designated archaeological remains (i.e. Scheduled Monuments) and their settings) did not raise any issues regarding Bladon Camp being scoped

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			out of the detailed assessment of likely impacts and effects of the Project on the heritage significance of designated heritage assets. The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Conservation Area at Church Hanborough is presented within paragraphs 1.9.115 – 1.9.118 of ES Appendix 7.5: Settings Assessment [APP-142]. It identifies that <i>'Land within the eastern part of the Conservation Area is within the Project Site Boundary, although no development is proposed within land that forms part of the Conservation Area and which would be maintained as grassland or similar. Areas of solar PV panels and PCSs would be visible in views out of, towards and across the Conservation Area, but this would not be the case for any in views out of, towards and across the historic core of the settlement other than views towards the village which include the tall spire of the church'</i>. The assessment concludes that the heritage significance of the Church Hanborough Conservation Area would be slightly harmed, leading to a long-term (time-limited), reversible 'minor adverse' effect. This is not a significant effect in EIA terms. The Applicant's detailed assessment of the likely impacts and effects of the Project on the Bladon Conservation Area is presented in paragraphs 1.9.106 – 1.9.110 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment found that <i>'The Conservation Area takes in the linear historic settlement core and a small amount of adjacent farmland on the eastern side. Whilst the boundary of the Conservation Area within this farmland appears quite arbitrary, it nevertheless serves to link the historic settlement core with the land to the east as it rises up towards Bladon Heath. The setting of the Conservation Area makes some contribution to its significance, with the key element being Blenheim Park immediately to the west'</i>.

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			The construction of the Project would see the placement of solar PV panels to the east and south of Bladon. A buffer zone has been established so that there is clear separation between the Conservation Area and any areas of panels, and land within this buffer zone would be maintained as grassland or similar. New hedgerows would be planted around the perimeter of the developed part of the Project Site to screen views of the solar PV panels and associated elements of the solar farm. However, this screened perimeter would be clearly visible within a number of 'significant views' which are identified in a 1990 Conservation Area Character Appraisal. The relationship between the Conservation Area and Blenheim Park would remain unchanged. The assessment concluded that the heritage significance of the Bladon Conservation Area would be slightly harmed as a result of the change within its setting. This represents an impact of 'low adverse' magnitude resulting in a long-term (time-limited), reversible 'minor adverse' effect. This is not significant in EIA terms. The location, nature and date of buried archaeological remains within the Order Limits for the Project have been established through a combination of desk-based research and a programme of fieldwork comprising geophysical survey and trial trenching. All of this work was agreed in advance with the Lead Archaeologist at Oxfordshire County Council. The results of the desk-based research are presented in ES Appendix 7.1: Historic environment desk-based assessment [APP-131] and ES Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology [APP-132]. The results of the programme of geophysical survey are presented in ES Appendix 7.3: Geophysical survey report Parts 1-8 [APP-133 – APP-140].

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			A programme of trial trenching has been undertaken within much of the Project Site, with a total of 885 trenches being excavated and recorded. The locations of all trenches, and the methodologies deployed for the fieldwork and recording, were agreed in advance with the Lead Archaeologist at Oxfordshire County Council. The reports on the results of this programme of trial trenching are being prepared and will be submitted into the Examination as soon as possible. A second phase of trial trenching will examine land within the proposed cable routes where these are outside the three main areas of the Project Site. The locations of these trenches will be agreed in advance with the Lead Archaeologist at Oxfordshire County Council. A further 32 trenches within the Central Site Area will also be excavated and recorded within this second phase of trial trenches. These are ones where the locations have been agreed with the Lead Archaeologist at Oxfordshire County Council but where the work could not be undertaken as part of the previous programme due to poor ground conditions. The mitigation strategy for buried archaeological remains within the Project Site has been agreed with the Lead Archaeologist at Oxfordshire County Council and ensures that all areas containing significant archaeological remains are excluded from the development and retained as managed grassland. This approach is set out in Table 7.14 and paragraph 7.9.7 of ES Chapter 7: Historic environment [CR1-003]. A total of 44 such areas within the Project Site have been identified and excluded from the development. These are indicated on ES Figures 2.1a – 2.1c Illustrative Masterplan [AS-020]. It is the Applicant's position, as set out in paragraphs 7.9.13 – 7.9.20 of ES Chapter 7: Historic environment [CR1-003], that the likely impact of the Project on archaeological remains of national and/or regional importance during the operation and maintenance phase of the proposed development would actually be beneficial rather than adverse. This is due to the removal of areas containing such archaeological remains from the current arable regime (which puts the

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			archaeological remains at risk from regular damage through ploughing) and the placement of these areas within managed grassland. The Applicant's assessment of the likely cumulative effects of the Project on the historic environment is presented in Section 7.10 of ES Chapter 7: Historic environment [CR1-003], using the methodology set out in ES Chapter 4: Approach to Environmental Assessment [APP-041]. The assessment identified cumulative effects of minor adverse significance in respect of several aspect of the historic environment including the Blenheim Palace World Heritage Site. These cumulative effects are not significant in EIA terms, and would be long-term (time-limited) and fully reversible in all cases.
1102	West Oxfordshire District Council	WODC sit on the Blenheim Palace World Heritage Site Steering Group and contributed to the preparation of the Blenheim Palace World Heritage Site Management Plan which was updated in 2017. WODC identify the Blenheim Palace WHS Management Plan as a material consideration in assessing development proposals in West Oxfordshire. Regard should be had through Examination as to whether the proposal would affect the setting of the World Heritage Site, particularly whether allowing development in the Green Belt would undermine the additional policy protection meant to conserve the setting of the Blenheim Palace WHS.	The Applicant has attended several Heritage Steering Group meetings over the past two years to hear and help address concerns relating to setting of the WHS. The Applicant is continuing to work with this Group and in particular Historic England to reach a satisfactory position with regards to the setting on the WHS. In terms of the interrelationship between Green Belt and setting of the WHS, the Applicant is of the view that none of the five purposes of Green Belt are expressly designed to preserve the setting of individual heritage assets. That is not the correct policy device to preserve the setting of the WHS. The main purpose of Green Belt is to preserve openness, but that is between towns (not villages or any other physical feature). To the extent there happens to be an overlap between 'openness' and 'setting', that is a coincidental one in planning policy terms. The Applicant believes it is important not to conflate the objectives of Green Belt policy with other policy requirements <i>are</i> designed to protect historic setting. Notwithstanding, the Applicant had had due regard to protect the setting of the WHS. The Applicant's assessment of likely impacts and effects of the Project in respect of the Blenheim Palace World Heritage Site is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This assessment was

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			undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England. The Heritage Impact Assessment identified a likely 'minor negative' impact on one attribute (Attribute 7) which contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. The overall assessment of likely impacts and effects of the Project on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003].

6. Local Ecology and Nature

RR-1102-14	Biodiversity Net Gain.	The Council welcomes the commitment to deliver Biodiversity Net Gain (BNG) above the minimum statutory requirement of 10% due to come into force in November 2025. The statutory biodiversity metric has been used to calculate the BNG outcome from the proposed development. However, this has only been calculated for area habitats and hedgerows, without taking account of the presence of watercourses within the site. As the red line boundary of the site encompasses a watercourse, to ensure compliance with the statutory biodiversity metric user guide, the watercourse module should be applied. Clarity is also needed as to whether a delay to habitat creation and enhancement works should be applied in the metric due to the construction period of two years.	Following discussions with Natural England, the watercourse section of the metric will be included in the BNG Assessment, following River Morph surveys. Although the total construction period is anticipated to be two years, as a staged approach to work areas will be undertaken (excluding temporary compounds), it is considered that the majority of the site will be constructed in less than one year from construction, as such the Project does not require temporal multipliers to be entered. This will be developed once further details of construction methodologies and timings become available.

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RR-1102-15	Farmland birds.	Although the majority of farmland birds and other birds recorded breeding/foraging and over wintering on site will be effectively mitigated for as part of the enhancement proposals for the solar farm, including hedgerows, woodlands, scrub and tussocky grassland, the Council are concerned about the proposed mitigation for skylark and lapwing. There are both priority species and written into the NPPF Chapter 15. The breeding bird assemblage identified within the project area is of county importance (Table 9.6.4 page 60 of the ES) and the Council therefore recommend that this should be given detailed consideration at examination to ensure that impacts on protected and priority species are avoided and adequately compensated. The proposed development will result in significant loss of breeding territories for the local skylark population resulting in a landscape scale impact. The proposed skylark plots within the project area are to provide winter foraging habitat for skylarks rather than being used for breeding. Mitigation for loss of breeding habitat is proposed via the creation/enhancement of 36 hectares (ha) of meadow on land that is not being used	Table 9.6.4 in ES Chapter 9 Ecology and Biodiversity [APP-046] sets out that the breeding bird assemblage is of County importance. This is carried through into the assessment of effects (e.g. section 9.9.90) and in the summary table 9.16.1. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species. The Project site will be managed through conservation grazing to create grasslands of varied diversity and structure. Recent research on the impact of solar farms on farmland birds (Copping <i>et al</i> 2025) found that solar managed for mixed habitats (either ungrazed or grazing with an allowance for wildflowers to set seed, woody hedgerow features) had significantly higher numbers of both farmland birds and bird species than an intensive arable baseline. Given that, as set out in the oLEMP [APP-235], the Project will be managed via conservation grazing with pauses in the grazing over the summer to allow plants to flower and set seed, it is anticipated that the Project will provide an overall enhancement for the bird assemblage present.

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		for solar arrays due to their archaeological importance. However, this quantum of compensatory habitat is unlikely to be sufficient as it appears to be comprised of small, spread-out parcels of land across the project area. Skylarks are unlikely to use proposed skylark plots for breeding when surrounded by solar panels as they require long, unbroken sightlines and minimal perches for raptors (predators). The solar panels themselves will therefore reduce the desirability of the area for nesting skylark due to the perceived risk of predation. Post-construction monitoring of over 100 solar farms in England and Wales found no evidence of nesting skylarks (In Practice Issue 117, September 2022, Chartered Institute of Ecology and Environmental Management, CIEEM). The Council calculates that in order to compensate for the recorded 228 no. breeding territories identified through the applicant's assessment, the development will need to provide 114ha of suitable habitat (based on two skylark territories per ha). In the absence of further clarification and justification for the applicant's approach, proposed compensatory habitat would appear to be insufficient. Measures to safeguard protected and priority species within the project area are essential but it is not clear whether specific measures or mitigations are	

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		included in the scheme to compensate for impacts on lapwing and nightingale habitat.	
RR-1102-16	Farmland bird strategy.	It is likely that a farmland bird compensation strategy will be required for the proposed development, which would need to consider the provision of off-site measures. This should be explored at Examination to ensure that the statutory and policy protections are being met.	The provision of extensive new permanent areas of bird habitat in the form of the archaeological areas to be managed for bird benefit, combined with the overall beneficial effect of solar compared to an arable baseline (as described by Copping <i>et al</i> 2025) means that the Applicant considers there to be no requirement for off-site mitigation with respect to farmland birds.
RR-1102-17	Wetland birds and aquatic invertebrates.	There has been no assessment of the potential effects during operation of the solar farm on wetland birds and aquatic invertebrates. The zone of influence of the impact assessment should take this into account due to the close proximity of several large waterbodies of value to birds in the local area, including Cassington Gravel Pits, Blenheim Lake and the Lower Windrush Valley Project Area. An understanding of the use of the wider landscape by wetland birds and aquatic invertebrates is needed to assess how the solar panels might influence the behaviour of these species and consequent impacts on their populations through mortality or reduced breeding success. Evidence suggests that the polarised light of solar panels can be confused by these species for open water, for example, resulting in dragonflies laying eggs on them. The size and density of the proposed solar farm project is such that this could result in a	Operational impacts on all breeding and wintering birds, and invertebrates identified within the Botley West Solar Farm have been assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [APP-046]. Although the lake effect has been hypothesised as a possibility, a review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. Research in the United States found some evidence that such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations and no evidence has been published demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping <i>et al.</i> 2025).

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		significant effect on local populations. The impact of the new linear corridors for wildlife created by the proposed screening is to be welcomed but the adverse impact upon species wishing to roam locally but prevented from so doing by the new fences and screening also needs to be factored in.	
RR-1102-18	Bats.	The bat survey concluded that the assemblage of bats present at the site is at least of national importance, due to the presence of two Annex II species – Bechstein’s and Barbastelle bats, which are using woodlands adjacent to the site for roosting, including maternity colonies. The mosaic of habitats within the site are also considered to have at least national importance for bats, including for foraging and commuting. However, the Environmental Statement concludes that the impact on the local bat population will be negligible due to the retention of the majority of the landscape features that the bats are using for foraging, commuting and roosting, and the protection of these with buffers. However, In particular, although there is mention of the provision of a suitable buffer to protect all important bat flightlines as a key commitment (ref. 9.20), these are not shown on the Masterplan or in any other documentation, including the CoCP, Outline Operation Management Plan and Outline Landscape and Ecology	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the ‘appropriate buffers’ for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England/other IPs with respect to the use of these data for this commitment are on-going.

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		Management Plan submitted with the application. there is limited information regarding proposed avoidance or mitigation measures for bats. In particular, although there is mention of the provision of a suitable buffer to protect all important bat flightlines as a key commitment (ref. 9.20), these are not shown on the Masterplan or in any other documentation, including the CoCP, Outline Operation Management Plan and Outline Landscape and Ecology Management Plan submitted with the application. The conclusion in the Environmental Statement that 5 metre gaps to be created in hedgerows are unlikely to cause changes to commuting routes and foraging habitats is unjustified as no information has been provided with regard to which hedgerows are important bat flightlines. This conclusion is therefore unsupported.	
RR-1102-19	Otter and water vole.	The Environmental Statement indicates that it is assumed that otters and water voles forage and commute within the project site, and that there may be otter holts (or laying up sites) along the river, but no surveys have been carried out to confirm this. It is recognised that there could be short term disturbance to otters due to noise and vibration during construction, and the impact assessment would be better informed if it were understood whether there were any holts	Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity [APP-046], otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact.

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		present along the river within the site. This is equally applicable to the potential for water voles to be present on the river (the Environmental Statement takes the approach that this species is adequately covered in the assessment of impacts to watercourses). This is particularly relevant to any crossings over watercourses within the site but could also apply to the installation of solar panels near watercourses (not just the main river).	This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean <i>et al</i>/2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced. All watercourses will be crossed via HDD with no open-cut methods proposed.
RR-1102-20	Great crested newts.	The ES ecology chapter appears to keep the licensing option for great crested newts open and refers to both a great crested newt mitigation licence and the District Licensing Scheme (administered	The Project will require a licence to address potential effects to GCN populations on and around the site. At this stage, it is anticipated that the Project will use a Natural England mitigation licence for GCN and discussions with NE in respect of

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		by NatureSpace). However, Section 8.3.1 in the Outline LEMP states that a Natural England mitigation licence will be obtained for the site, so no off-site compensation would be possible. It is unclear why the District Licensing option has been discounted. If the District Licensing Scheme is not used, then we would consider this a significant missed opportunity for landscape-scale conservation for this species if all habitat works are carried out on site only (via the standard mitigation licence approach). Use of the District Licensing Scheme can be secured via the appropriate wording from the standard planning conditions and translated into planning requirements within the DCO. The Council recommends that NatureSpace should be consulted for their comments to inform the Examination to understand the details of the likely impacts to this species. The closest ponds are located 20m (P83) and 30m (P64) of the site boundary and the nearest great crested newt population through surveys was P19, 130m from the site. Although the majority of suitable habitat will be retained, apart from small sections of hedgerow spread across the site for vehicular access, there would be temporary disturbance and loss of terrestrial habitat as a result of the proposed development. The council notes the negative eDNA result from the ponds at City Farm where great crested newts	this are on-going. However, the Project may make use of the DLL, if that is more appropriate, as per commitment 9.13.

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		were previously recorded (for the Salt Cross Garden Village outline planning application) and that ponds with a 'below average' or lower score in the HSI assessment were not subject to an eDNA survey. Negative eDNA survey results from a single survey are not sufficient to prove absence, several years' worth of negative eDNA results are needed in line with Natural England guidelines (for licence applications) and the species does occur in below average suitability ponds. The HSI assessment is not intended to be a marker for which ponds are likely to contain newts or not.	
RR-1102-21	Outline Landscape and Ecology Management Plan (OLEMP)	The Outline LEMP refers to a detailed LEMP being produced by condition as part of the DCO. The Council recommends that this should be for lifetime of the development and include monitoring for BNG. The guidance in EN-1 5.4.44 indicates that any habitat creation or enhancement delivered for compensation or Biodiversity Net Gain would be maintained for a minimum of 30 years, or for the lifetime of the project, whichever is longer. The oLEMP mentions monitoring for 30 years, but elsewhere references monitoring for the lifetime of the project. Clarification and correction of the documents is therefore suggested to provide certainty that management and monitoring will be undertaken for the lifetime of the development as a	The Project site will be managed and maintained for the lifetime of the Project, as set out in paragraphs 1.1.10 and 17.1.1 of the oLEMP. The reference to 30 years is in respect of the minimum commitment for the maintenance of features for Biodiversity Net Gain purposes. However, this will be clarified in the next iteration of the oLEMP. The bee hives will be in accordance with those identified in Appendix A of the OLEMP [APP-235], providing habitat for native invertebrate species. Project edges containing meadow grassland with wildflowers for invertebrates are outlined in the OLEMP [APP-235].

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		minimum. The Council would also encourage the ongoing management of habitats created/enhanced as compensation and for Biodiversity Net Gain to extend beyond the lifetime of the project. The Outline LEMP lists the inclusion of "bee hives" in (see section 9.12 of Table 9.8.1 on page 71 of the ES ecology chapter), however, we are unconvinced that it would be appropriate as it would increase competition with native bumblebees and other pollinating insects. Depending on the number of bee hives, it might be possible to locate these in areas of wildflower-rich habitat to ensure a lower level of competition with native bees. Further clarity is required on this part of the proposals. It is the intention as set out in the oLEMP for multiple LEMPs to be produced for the different zones within the site, and for these to be approved by the District Councils before be responsible for monitoring the implementation of the LEMPs. The applicant needs to demonstrate the mechanism for ensuring that the District Councils are adequately resourced and funded to do this and set out the mechanisms whereby the District Councils could take enforcement action in case of non-compliance commencement. This presents an issue in terms of oversight of the whole project and who will be responsible for monitoring the implementation of the LEMPs. The	

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		applicant needs to demonstrate the mechanism for ensuring that the District Councils are adequately resourced and funded to do this and set out the mechanisms whereby the District Councils could take enforcement action in case of non-compliance.	
RR-1102-22	Landscape proposals.	The aim of the proposed development is to create a landscape-scale wetland corridor along the River Evenlode, which is welcomed by the Council, and this aligns with the priorities and mapping in the emerging Local Nature Recovery Strategy for Oxfordshire. However, there the enhanced connectivity for other habitats, notably ancient woodlands, is not given the same weight. Hedgerow planting is planned to provide connectivity between Tackley Wood and the Blenheim Estate, and Bladon Heath and Burley Woods. While this is welcomed in principle, the current proposals only integrate the minimum 15 metre buffer to these ancient woodlands, and this would seem to be a missed opportunity to allow for woodland expansion in future. The woodlands would effectively become surrounded by solar panels for 42 years and therefore restrict the ability of any future woodland restoration plans. The Council recommends that the potential for wood pasture and natural woodland	Noted re the broad alignment between the Ecology Strategy for the Project and the emerging LNRS. The Project has committed to providing appropriate buffers along key flightlines for bats (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). The nature of the buffers with respect to management and habitat creation will be set out in more detail in the bat technical note to be published. However, it is intended that such buffers support the connectivity for bats and other wildlife between the ancient woodland blocks and ensure that the overall permeability of the landscape remains post development.

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		regeneration in the area is explored further to provide greater woodland connectivity, aligning with the mapped measures in the emerging LNRS and supporting the important bat populations that have been found to use these woodlands.	
7. Hydrology and Flood Risk			
RR-1102-23	Cassington	West Oxfordshire District Council highlighted the potential for surface water impacts arising from the proposal to the north of Cassington through the pre-application consultation response. The applicant has undertaken modelling to assess potential for surface water impacts in this location and has proposed measures to mitigate the impact of the proposal and to provide betterment in relation to existing surface water conditions. These measures include the provision of SUDS, ditch maintenance and bunds to the north of Cassington. The council supports measures that would address existing issues of surface water flooding at Cassington. Consideration should be given to whether proposals for surface water drainage across the site would be acceptable. Further supporting information may be required including ground investigation reports and detailed drainage layouts with identified discharge locations. Further detail should be provided on how the fields beneath the panels will be managed during	We note the comment regarding the surface water modelling that was undertaken for Cassington, which will be progressed further at the detailed design stage. Formal discharge locations are not proposed for the solar panels. As part of the Project, solar arrays are to be placed with a 1.5 m to 3 m gap to provide adequate spacing to prevent the concentration of surface water dripping from the solar arrays and therefore the formation of drip lines. In addition, gaps are proposed between solar cells themselves, so that water will not fall from the lowest leading edge. Vegetation will be placed beneath the panels to allow for infiltration at the lowest leading edge of the panels. These measures ensure there is no significant increase in runoff or gully erosion. A soil/grass management plan will be included at the detailed design stage to ensure that the ground does not become bare due to the lack of maintenance, and therefore, the peak runoff discharge does not increase over time. The sloping ground in this case will improve solar exposure. 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233], 7.6.2 - Outline Operational Management Plan [APP-234] and 7.6.4 - Outline Decommissioning Plan [APP-236] detail how fields beneath the panels will be managed during construction, operation and decommissioning. Detailed plans and layouts will be progressed at the detailed design stage, as set out in the above documentation.

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		construction, operation and decommissioning in order to maintain suitable vegetation cover beneath panels and to ensure that the soil is not compacted by machinery during construction and maintenance.	
8. Noise and Vibration			
RR-1102-24	Noise from PCS units	There is concern over noise from the 156 PCS units on residential receptors as well as users of the PROWs. WODC highlighted concerns at the pre-application consultation about the volume and frequency of noise generated by power converter stations, due to the number of units (156) and the sound power level (96 Lw, dB(A)) The council consider that there would be likely significant detrimental impacts on human health, amenity use of the countryside, tranquillity of the countryside and wildlife over a wide area as a result of the noise impacts of project infrastructure. The applicant's noise and vibration assessment primarily covers the impacts on sensitive receptors which is limited to residential dwellings within and on the edge of the site. Consideration should be	The noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference EN010147/APP/6.3, with additional information provided in ES Volume 2 (Figures) [EN010147/APP/6.4], and ES Volume 3 (Appendices)[EN010147/APP/6.5]. The assessment shows that sound from the development will be equal to or below the background sound level at all receptors and so will not be a significant source of sound at any property. This assessment is based upon the PCS units operating close to capacity, which will only occur for a small proportion of the year. During the majority of the time the sound from these PCS units will be less than is shown in the assessment. The assessment has been undertaken using the computer noise modelling software SoundPLAN version 9.1. This software includes the topography of the site. The main focus of this assessment is to determine the potential noise and vibration impact of the development on residential receptors. However, we have undertaken a review of the PROW in the area and identified only a small number which will cross the site. It is possible that noise from the PCS units will be slightly audible in some areas of some PROWs crossing the site. However, it is not uncommon for industrial noise to be audible on PROWs, as is experienced

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		given to the noise and vibration impacts of the proposed solar farm and associated infrastructure on the wider countryside, users of the public rights of way network, wildlife and the tranquillity of the landscape	alongside the Siemens factory in Witney. Furthermore, receptors on PROWs are transient, and so any potential impact experienced by noise from the development, whilst on a PROW, would be for a very short period of time, thereby reducing the magnitude of any impact.

9. Agricultural Land Use

RR-1102-25	West Oxfordshire District Council	The applicant has scoped out the assessment of temporary and permanent loss of best and most versatile land during operation and maintenance of the Project. The applicant suggests that there would be no works during the operation and maintenance phase of the Project that would result in the temporary or permanent loss of best and most versatile land. In addition, they propose that soils located below the solar panels will be retained and made available for grazing during operation of the Project. On this basis, they argue that the temporary and permanent loss of best and most versatile land during operation and maintenance of the Project is unlikely to result in likely significant effects and has been scoped out the assessment in this Chapter of the ES. The LPA have considerable concerns with the above approach. The applicant's mapping submitted in support of the application indicates significant coverage of Best and Most Versatile across the project area. It is not clear that the proposed design, layout or scale of the project has been shaped by the presence	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the whole Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). The assessment of the significance of effects of the Project on ALC identifies that only 5.5ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6). In terms of the distribution of grades, according to the provisional mapping of ALC grades within Oxfordshire, the county comprises approximately 20.9% Grades 1 and 2 land, 58.5% of Grade 3 land (which includes both Subgrades 3a and 3b) and 20.1% Grade 4 land (Table 17.14 of ES Chapter 17 [APP-054]). If only one third of the provisionally mapped comprised Subgrade 3a land, this would provide an estimate of an average of 40.4% Grades 1,2 and 3a in Oxfordshire. The detailed ALC survey results for the Project site (Table 17.17 of ES Chapter 17) identify that only 7.4% of the land comprises Grades 1 and 2 land, with approximately 29% Subgrade 3a land. In comparison to the pattern of land quality that might be expected in the wider county, therefore, the distribution of land quality grades within the Project site comprises a typical, if not slightly lower average percentage of the best and most versatile land. The temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). The inherent quality of the best and most versatile land would not therefore be lost within these areas as a result of the Project.

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		of Best and Most Versatile Agricultural Land. As this is a non-renewable resource there should be a strategy to avoid its loss and to consider mitigation only where loss is very small in scale and unavoidable. Similarly, a strategy to focus the development on the poorest quality land should have informed the site scoping stage of the scheme. A key policy objective for West Oxfordshire is to protect and conserve soil resources and this includes Best and Most Versatile Agricultural Land. Our response to the PEIR consultation identified areas of land that could be removed from the project to avoid multiple harms including landscape, heritage and loss of BMV land. The design of the scheme has not responded to these comments.	The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). The socio-economic impacts of the proposed changes in the agricultural use of the site based on the current pattern of agricultural land use within the Project site are assessed in Section 15.9 of Chapter 15 of the ES [APP-052]. However, decisions about changes to the pattern of land management within the Project site in the future both with or without the implementation of the Project remains a matter for the owners and farming enterprises occupying the land to determine at that time.
1102	Draft Development Consent Order	West Oxfordshire District Council will provide detailed comments on the draft DCO covering the scope of the authorised development, the schedule and drafting of requirements. WODC expect their views on the drafting and approvals process for DCO requirements to be given significant weight in their role of ensuring that the impacts upon our local environment and communities are minimised, and as an approving and enforcement authority.	The Applicant welcomes feedback from WODC on the draft DCO through the Examination Process, and acknowledges its views given its role as an approving and enforcement authority.

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10. Community Benefits and Impacts			
1102	Community Benefits Package	WODC support the provision of community benefits arising from the scheme and will seek to secure a Community Benefits Agreement (CBA) with the Applicant, to support the delivery of community benefit and environmental improvement projects in the area. WODC are working with affected parishes on a suitable mechanism for collecting and implementing a community benefit fund as a means by which to secure benefits if the project receives planning consent. The amount currently being offered by the applicant (£200,000 p/a) is considered inadequate for a development of this scale. Negotiations on a community benefit agreement (CBA) are therefore expected to continue alongside the planning process and will be supplemental to any section 106 agreement required to mitigate the adverse impacts of development.	The Applicant acknowledges the concerns and notes that a community benefit fund is not a requirement but is an optional benefit to be provided by the Applicant. The fund will be part of a Community Benefits package outside the scope of the DCO application, to be agreed with the relevant local authorities. (See Planning Supporting Statement paragraphs 3.5.24 and 8.4.71 APP/7.1). The Applicant has held discussions with Parish, District and County Councils and has now agreed to an annual fund payment of £525 per MW, £441,000. This will deliver £16,5000,000 over the 37.5 year life of the project, before indexation. The Scottish figure of £5000 per MW is applicable to onshore wind turbines, not solar farms.



Botley West Solar Farm

Applicant Responses to Relevant Representations -
Environment Agency [RR-0308]

June 2025

PINS Ref: EN010147
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I. Applicants' Comments in response to the Relevant Representations submitted by the Environment Agency [RR-0308]

Table II-1: Applicants' Comments on Relevant Representations

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
1. Hydrology and Flood risk			
RR-0038-001 Environment Agency	Inspections & Surveys	Issue Unknown condition and geometry of flood assets near cable crossings. Impact Potential damage to flood assets, increasing flood risk vulnerability Solution Conduct pre-works and post-works surveys of flood assets, considering settlement and vibration impacts. Include remediation for defects. Additional Comment The Applicant should consider as-built drawings and will need to carry out an investigation to determine the flood asset geometry and whether buried elements are present. EAREQ-001: We request the inclusion of a DCO Requirement to provide a pre-works and post-works survey of the flood assets intersected by the cable crossings with consideration of settlement and adverse effects from vibration. Remediation for defects identified. HDD offsets should be informed by as-built drawings and surveys.	The inclusion of pre-works and post-works surveys of flood assets are to be added as a commitment to an updated version of 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation as embedded mitigation.
	Horizontal Directional Drilling Cable Depth	Issue Proposed HDD depth may restrict adaptability of flood assets Impact The shallow depths of HDD may lead to increased flood risk if future flood defence assets cannot be adequately designed and installed. Solution Require a minimum HDD depth of 5m below hard bed and flood assets. Provide general arrangement drawings showing proximities.	The Applicant confirms that HDD depth under main rivers would be at least 1.5m below flood assets and 2m below hard bed. The minimum depths were established by EA guidance published on Gov.UK which states "the service crossing is at least 1.5m below the riverbed along its whole length, and the same height is maintained for at least 5m beyond each bank (measured from the top)." This has been presented and committed to as commitment 10.4 within 6.3 - ES Chapter 10 - Hydrology and Flood

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		Additional Comments We are seeking a cable depth of 5m below hard bed and flood assets for main rivers to allow for future replacement of flood assets (e.g. sheet piling) and allow dredging of the watercourse in future. The Applicant has proposed a HDD depth of 2m below hard bed and 1.5m below flood assets. The proposed depth below a flood asset will need to be demonstrated to be safe. EAREQ-002: We request the inclusion of a DCO Requirement to ensure HDD occurs at a minimum cable depth of 5m below hard bed and flood assets.	Risk [APP-047] as embedded mitigation. The actual depth of the HDD at main rivers would likely be deeper. Drill profiles will be determined and confirmed depths provided during detailed design.
	Horizontal Directional Drilling Horizontal Distance (Entry / Exit Pits)	Issue Unclear compliance with local plan for main rivers. Impact Inadequate buffer from watercourses, increasing flood risk. Solution Maximise HDD entry and exit pit distances from watercourses, measured from top of bank or most landward extent of the flood asset (whichever is more conservative). Additional Comments The Applicant should look to maximise the distance of the HDD entry and exit pits distances from the watercourse, we would therefore look for there to be compliance with the local plan for main rivers. Note that this distance should be measured from the top of bank or most landward extent of the flood asset (whichever is more conservative). We would advise consistency across the whole site where feasible e.g., 10m. EAREQ-003: We request the inclusion of a DCO Requirement to maximise the distance of the HDD entry and 5 exit pits distances from the watercourse compliant with the local plan for main rivers.	The inclusion of a 10m buffer distance to be provided across the development from the banks of the watercourses, or the leeward extent of the flood asset (whichever is most conservative. This will be added as commitment to an updated version of 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation.
	Spoil from Excavation	Issue Potential placement of spoil in flood-prone areas. Impact Increased flood risk from displaced floodwaters. Solution	The majority of temporary facilities will be placed outside of Flood Zone 3. However, 2 HDDs (two options in Swinford bridge HDD 6), and another one (HDD 12) have HDD construction compounds that are within flood zone 2/3. In these locations, any

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		Store spoil outside the design flood extent wherever possible. Additional Comments EAREQ-004: We request the inclusion of a DCO Requirement to ensure spoil is stored outside the design flood extent and outside of Flood Zone 3b.	temporary spoil material during construction will be stored outside of Flood Zone 3.
	Freeboard to Solar PV Panels	Issue Proposed 200mm freeboard is insufficient to address flood risk. Impact Inadequate protection from flooding for PV panels and sensitive equipment. Solution A requirement regarding this issue is necessary. Please see Issue ref. EAREQ-005 below. Additional Comments EAREQ-005: We request the inclusion of a DCO Requirement relating to the solar panel freeboards and a level of 300mm.	Solar panels will be located within Flood Zone 1. As such will sit outside of fluvial flood extents. The lowest leading edge of the panels will be set at 0.8m across the height. There are limited areas of the site where surface water flood depths could reach 600m in accordance with published surface water maps. At these limited locations, the panels will still have a freeboard, but this is less than 300mm. The area in question constitutes less than 1% of the total site area. Therefore, only a small portion of the solar panels would experience flooding at their base, and the depth of flooding is limited. A freeboard of 200mm is deemed appropriate in these locations, given the nature of the development feature type, which is waterproof. The design team and client were comfortable with the impact that any minor flooding in these areas could have on the development and the operational capacity.
	Code of Construction Practice, Operational Management Plan, Decommissioning Management Plan	Issue Detailed Code of Construction Practice (CoCP), Operational Management Plan (OMP), and Decommissioning Management Plan (DMP) not yet developed. The construction phase flood risk management depends on the Outline CoCP. Impact Potential oversight in flood risk management and inadequate mitigation of construction-related flood risks.	Provision for preparation of a Flood Risk Management Plan to be prepared as part of the Outline CoCP, has been included as commitment 10.10 within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. The inclusion of this and the details during the Detailed CoCP preparation will include consultation with the EA.

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		Solution Flood risk management to be included within the CoCP. Additional Comments The Environment Agency should be consulted on the detailed CoCP, OMP, and DMP.	
	Design Life / Time-limited Agreement and Decommissioning Management Plan	Issue Uncertainty in decommissioning phase impacts on flood risk and the potential extension beyond 2069 without reassessment. Impact Adverse effects on flood risk during decommissioning and Increased flood risk due to outdated climate change projections. Solution Consult the Environment Agency on the DMP before decommissioning. Clarify timelines and components to be removed or retained. Additional Comments We would expect the Environment Agency to be consulted on the DMP prior to the decommissioning phase commencing. We note the inclusion of a requirement for decommissioning to be commenced no later than 37.5 following the date of final commissioning. However, if there are delays in construction and commissioning and the proposal is extended beyond 2069 (inclusive of the decommissioning phase), the reassessment of flood risk and mitigation will be needed as it would extend into the next climate change projection epoch https://www.gov.uk/guidance/flood-risk-assessments-climatechange-allowances	We note the comment regarding the potential for construction delays to potentially require a reassessment of flood risk and mitigation for the decommissioning phase. Should this occur then the EA will be reconsulted as part of a resubmission of flood risk and mitigation requirements.
	Evidence Gap(s) and the Placement of Components	Issue Flood risk hasn't been adequately assessed. There exist evidence-gaps relating to flood risk, notably for watercourse catchments of less than 3km ² Impact Inappropriate placement of components, potentially increasing flood risk. Solution	The comment regarding catchments less than 3 km ² was received as part of the PEIR comments dated 30 November 2023 – 8 February 2024 (reference: XA/2024/100059/01-L01). Following receipt of these comments, RPS provided a technical note under reference: HLEF 82808_WestBotley_RespondtoEA_TN_v1-FINAL dated 11th June 2024. This note provided further

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		Address evidence gaps using appropriate methods. Place permanent development in Flood Zone 1, outside of the design flood extent, and 1000-year Surface Water Flood (SWF) proxies. Conduct site-specific hydraulic modelling where needed. Additional Comments The Applicant should ensure that where there are evidencegaps relating to flood risk that they have applied an appropriate method to ensure that the permanent development is outside of areas of flood risk. This should be a combination of placing components within Flood Zone 1, placing outside of the site-specific hydraulic modelling design flood extent, and placing outside of the 1000-year SWF proxies used for the fluvial flood risk of a watercourse (where the climate change uplift has been demonstrated to be conservative). Note that we would expect site specific hydraulic modelling of fluvial flood risk for main rivers. We need clarity about where the Applicant is proposing to use SWF modelling as a proxy for fluvial flood risk, this should be represented on a map for clarity. Similarly, it should be demonstrated where the Applicant is stating that the flood risk is purely SWF risk, as they are proposing permanent components in some of these extents. Notably the proposed substation(s) are potentially within an area which may be at risk of flooding, but this has not been modelled – this will need site-specific hydraulic modelling. As the flood risk in this area is complicated, it would be helpful to have a meeting to talk through which methods are considered acceptable for each watercourse where evidence-gaps exist within the study area. By way of example: FRA 3.4.15 which suggests that the section of the Central Site Area located in the Cherwell Council boundary is wholly located in Flood Zone 1. Along the Rowel Brook at coordinates (446312, 214649), the Flood Map for Planning (FMfP) does not show a representation of fluvial flood risk as the catchment is less than 3km² and there is no existing site-specific hydraulic	information regarding the points raised by the EA in the consultation comments. Following the submission of this note, a meeting was held by RPS with the EA on the 24th July to discuss the technical note. Most of the comments were agreed to have been resolved and clarified within the Technical Note during the meeting. However, additional information was requested for several outstanding comments, including catchments less than 3 km². A further technical note was submitted on the 23rd August 2024 (reference: XA/2024/100059/01-L01). This latest technical note details how 1000-year surface water extents are used as a proxy to assess catchments of a small size using ReFH2 to assess the peak flows, as discussed and agreed in the aforementioned meeting.

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		modelling. In cases like this within the study area, we need specificity on the approach taken to address the flood risk evidence-gap.	
		There exist at least three areas of concern within the southern parcel in the context of a fluvial flood risk evidence-gap, namely watercourses at coordinates (444840, 205274), (445353, 205449), and (446472, 205824).	
	Flood Zone 3a and 3b	Issue Unclear intersections of proposal with Flood Zones 3a and 3b. Impact Unknown impacts on flood risk from structures (temporary works, compounds, or permanent structures) within Flood Zone 3. Solution The Applicant should provide mapping that shows Flood Zones 3a and 3b in the context of the proposed components and the cable corridor route. The corridor route should minimise interaction with Flood Zone 3b, and route selection should be informed by this consideration. Additional Comments Part of the application site is likely to lie within the 3.3% annual exceedance probability (AEP) flood outline, which is identified by the Table 1 of the Flood Zone and flood risk tables of the PPG as within Flood Zone 3b (the functional floodplain). Please be aware that development should be avoided within the 3.3% AEP (Flood Zone 3b) where possible, which is defined by the PPG as land where water from rivers, or the sea, has to flow or be stored in times of flood.	The Applicant has, where possible, sought to direct the development to areas assessed as Flood Zone 1. However, there are, on occasion, other material constraints which direct development to a higher risk of flooding. An assessment of cable route corridor options was undertaken to assess multiple routes in line with environmental constraints. However, appropriate mitigation measures are implemented in these situations. In each instance, the crossing of floodplain 3b is necessary to facilitate the crossings, and therefore, modelling would be unlikely to add any further information to the chosen route.
	Reservoirs	Issue Potential impact on nearby reservoir. Impact Increased flood risk from reservoir failure. Solution	One reservoir has been identified within the study area, which is Farmoor Reservoir. Whilst we note the comment, Thames Water are responsible for Farmoor Reservoir and has been consulted as part of the DCO application. Thames Water have raised no

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		Liaise with reservoir undertakers to assess impacts and acceptability of works near reservoirs Additional Comments Contact the Undertaker of Farmoor reservoir for their input, especially in relation to acceptability of works in proximity to the reservoir as this may pose a risk and require input from a qualified engineer to ensure this is safe.	concern regarding potential impact to this reservoir or additional detailed assessment beyond that made within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047].
	Flood Risk Assessment	Issue Potential gaps in the FRA. Impact Incomplete understanding of flood risks and mitigation. Solution Cross-check the FRA against government guidelines to ensure comprehensive coverage.	The FRA details how flood risk has been assessed by the NPPF (set out in Table 1.4) and NPS (set out in Table 1.3) of the FRA; ES - Appendix 10.1 Flood Risk Assessment [APP-166]. These tables set out the key provisions that were undertaken in line with the guidance. Additional information was added to the FRA since the PEIR comments were received from the EA. These consultation comments and responses are detailed within 6.5 ES - Appendix 9.16 Section 42 Consultation Responses [APP-165].
	Temporary Facilities Plan	Issue Lack of fluvial flood risk mapping in relation to temporary facilities. Impact Inadequate placement leading to increased flood risk. Solution Provide Temporary Facilities Plan relative to fluvial flood risk mapping, including hydraulic modelling and proxies. Additional Comments Provide the Temporary Facilities Plan relative to fluvial flood risk mapping used to inform the placement of components 10 (e.g., site specific hydraulic modelling flood extents and proxies for fluvial flood risk, and Flood Zones).	The majority of temporary facilities will be placed outside of Flood Zone 3. However, 2 HDDs (two options in Swinford bridge HDD 6), and another one (HDD 12) have HDD construction compounds that are within flood zone 2/3. The inclusion of a Temporary Flood Management Plan will be added as a commitment within the updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. A plan showing the location of the temporary facilities overlain on flood maps will be submitted to the Examination as part of the next Deadline.

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	Crossing Schedule Map	Issue No map supporting watercourse crossings Impact Unclear assessment of impacts on watercourses and flood risks Solution Provide a map showing proposed crossings of watercourses within the Crossing Schedule.	A plan showing the location of the watercourse crossings will be overlain on flood maps and will be submitted.
	Buffers/ Easements	Issue Inconsistent buffer distances from watercourses and flood assets. Impact Increased flood risk and potential damage to flood assets. Solution Maximize component distance from watercourses, ensuring consistency across the site (e.g., 10m buffer). Clarify if buffers apply to construction phase works. Additional Comments We would look for there to be compliance with the local plan for main rivers. Note that this distance should be measured from the top of bank or most landward extent of the flood asset (whichever is more conservative). We would advise consistency across the whole site where feasible e.g. 10m. Please clarify if the buffer is also applicable for the construction phase works as a mitigation against damage to flood assets.	Clarity will be added to updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] and supporting appendices to confirm that a 10m development stand-off buffer includes the construction phase. This will be added as an updated commitment within embedded mitigation. Buffer will be taken from the top of the banks of the watercourses. A plan will be provided to support the commitment.
	Updated Risk of Flooding from Surface Water data	Issue This section notes that the identified surface water risk is shown in the online EA Risk of Flooding from Surface Water (RoFSW) dataset. Please note, an updated RoFSW dataset was published on the 28th January 2025 which does include climate change for the 2050s epoch. Further information is available online here: : Updates to national flood and coastal erosion risk information - GOV.UK Impact Updated data is available which may change the flood risk understanding for smaller ordinary watercourses Solution	RPS are undertaking a technical note, which will assess the existing and updated surface water mapping to confirm the approach remains valid. This will be supplied to the EA.

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		In the light of updated Risk of Flooding from Surface Water (RoFSW) data it would be prudent to confirm that the conclusions of the original assessment using the 1 in 1000-year dataset still remain valid	
	Flood risk for the upper reaches of the Rowel Brook	Issue No consideration of flood risk in the upper reaches of the Rowel Brook has been provided within the Flood Risk Assessment other than a reference to the existing Flood Zones. Impact Flood risk to the development could be underestimated. Solution Consider the flood risk to the development associated with the Rowel Brook. The upper reaches of this watercourse do not have any Flood Zone mapping due to the small size of the catchment. Undertake an assessment of flood risk for the upper reaches of the Rowel Brook. Confirm if infrastructure is outside of the design flood extent. If infrastructure is being placed in areas of flood risk associated with this watercourse, then hydraulic modelling will be required to quantify the risk to and from any development.	The upper reaches of the Rowel Brook has a catchment less than 3 km ² . A technical note was submitted on the 23rd August 2024 (reference: XA/2024/100059/01-L01). This latest technical note details how 1000-year surface water extents are used as a proxy to assess catchments of a small size using ReFH2 to assess the peak flows, as discussed and agreed in a meeting with the EA. As such, this assessment is included within the FRA surface water and ordinary watercourses section and considers the risk from this source; ES - Appendix 10.1 Flood Risk Assessment [APP-166].
	Flood Risk Summary Central Site reporting error	Issue This section notes that permanent development and temporary development have been restricted to area outside the 100 year plus 46% fluvial and the 1000 year surface water flood extent associated with ordinary watercourses. This is welcomed although it is not clear what scenario the 100 year plus 46% fluvial extent relates to as the higher central scenario for the Gloucestershire and the Vale management catchment for the 2050s and 2080s epoch respectively is 19% and 41%. For the Cotswolds management catchment this is 21% and 43% respectively Impact Climate change allowances presented appear to be incorrect which could be misleading. Solution	Hydraulic modelling was undertaken to explore a greater developable area within the flood zones. The approach has since been simplified and development has been instead steered to Flood Zone (outside of the 1 in 1000 year extent). This updated approach will be detailed within an updated ES Appendix 10.1 Flood Risk Assessment [APP-166].

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		Correct the section of the report which refers to the 1 in 100 year plus 46% fluvial extent or provide clarity as to what this scenario relates to.	
	Localised hydraulic model	Issue The checks of the Risk of Flooding from Surface Water (RoFSW) data for the Filchampstead Brook for the 1000-year scenario are welcomed. We note that the main substation, secondary substation, and NG substation are near this watercourse. Inspection of the updated RoFSW outputs (January 2025) show that the main substation as shown on drawing EN010147/APP/6.4 dated November 2024 intersects the RoFSW extent. Impact Flood risk to the main substation, secondary substation, and NG substation could be underestimated. Solution The applicant should undertake more detailed analysis for the Filchampstead Brook and associated tributaries in the form of a localised hydraulic model which demonstrates that substation is resilient to flooding and does not increase flood 13 risk elsewhere. This modelling could take the form of a simple 1d or 2d model. Specifically, this should focus on the watercourses which start at grid references 444810 205250 and 445380 205050 and the Filchampstead Brook (Main River section) down to Filchampstead. This would provide confidence in the design flood level with regards to the substation, secondary substation, and NG substation	Comments regarding catchments less than 3 km² was received as part of the PEIR comments dated 30 November 2023 – 8 February 2024 (reference: XA/2024/100059/01-L01) and this applies to Filchampstead Brook. Following receipt of these comments, RPS provided a technical note under reference: HLEF 82808_WestBotley_ResponsetoEA_TN_v1-FINAL dated 11th June 2024. This note provided further information regarding the points raised by the EA in the consultation comments. Following the submission of this note, a meeting was held by RPS with the EA on the 24th July to discuss the technical note. Most of the comments were agreed to have been resolved and clarified within the Technical Note during the meeting. However, additional information was requested for several outstanding comments, including catchments less than 3 km². A further technical note was submitted on the 23rd August 2024 (reference: XA/2024/100059/01-L01). This latest technical note details how 1000-year surface water extents are used as a proxy to assess catchments of a small size using ReFH2 to assess the peak flows, as discussed and agreed in the aforementioned meeting.
	Hydraulic model sense checks	Issue The hydraulic modelling report is incomplete. The hydraulic modelling report for the River Evenlode is fundamentally the same as the hydraulic modelling report which was reviewed by the Environment Agency in November 2023.. With regards to the hydraulic modelling, several comments were raised by the Environment Agency on the modelling. The Environment Agency has not received any response in relation to the comments on the River Evenlode hydraulic	Hydraulic modelling and supporting hydrology was undertaken to explore a greater developable area within the flood zones. The approach has since been simplified and development has been instead steered to Flood Zone (outside of the 1 in 1000 year extent). This updated approach will be detailed within an updated ES - Appendix 10.1 Flood Risk Assessment [APP-166].

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		modelling. A key comment was with regards to a verification exercise of the model results, for example comparing the median annual water level (L-med) at the gauge Cassington Mill gauge with the 2-year water level in the hydraulic model. Similarly, a sense check of design water levels in the hydraulic model against the historic water level record at Cassington Mill is required to verify the sensibility of the results Impact It is not possible to verify the model results. Solution Provide a response to the comments raised by the Environment Agency on the River Evenlode Hydraulic modelling in November 2023. A sense check of design water levels in the hydraulic model against the historic water level record is required This would involve extending the hydraulic model further downstream past the Cassington Mill gauge. If it is not possible a comparison of design flows at the model outlet with design flow estimates at the Cassington Mill gauge would provide some confidence that modelled flows are reasonable and of the right magnitude.	
	Lumped flow estimation point	Issue Hydraulic model is incomplete thus flood risk not understood. A lumped flow estimation point is not included at the downstream end of the study extent, for example at the Cassington Mill gauge. This would enable comparisons to be undertaken with the flows at the outlet in the hydraulic model. Impact It is difficult to verify the model results as there is no flow estimation point at the catchment outlet. Solution Consider adding a lumped flow estimation point at the downstream end of the study extent, at the Cassington Mill gauge. This would help to verify the hydraulic model flows	Hydraulic modelling and supporting hydrology was undertaken to explore a greater developable area within the flood zones. The approach has since been simplified and development has been instead steered to Flood Zone (outside of the 1 in 1000 year extent). This updated approach will be detailed within an updated ES - Appendix 10.1 Flood Risk Assessment [APP-166].

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		at the catchment outlet and would add confidence to the model results.	
	Pooling group – Cassington Mill gauge	Issue The Cassington Mill gauge (National River Flow Archive Number 39034 – suitable for pooling) is not included in the pooling group which has been used in the hydrological assessment. This gauge should be included within the hydrological assessment as it is located on the watercourse which has been modelled. Impact The hydrological assessment would have benefited from the inclusion of the Cassington Mill gauge within the pooling group. This is a gauge which is located on the River Evenlode and including it would help to improve confidence in the design flow estimates for the River Evenlode. Solution Clarify the rationale for not including the Cassington Mill gauge in the pooling group and undertaking an Enhanced Single Site Analysis (ESS). Confirm if design flow estimates vary significantly if Cassington Mill is included.	Baseline model files to be supplied to the EA for their consideration. The surface water modelling was undertaken to support potential betterment upstream of Cassington and has been undertaken as enhanced mitigation, commitment 10.14 within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047]. At the detailed design stage, option modelling will be undertaken (where required) to quantify the betterment provided, and this will be submitted to the EA.
	Modelling review and commitment to betterment	Issue This section notes that design proposals for intervention measures are likely to be iterative and further stakeholder engagement is required. While this is welcomed, we appreciate that modelling has not been reviewed. Impact Flood risk is not understood. Solution Provide a copy of the hydraulic model files so that the baseline flood risk representation can be appraised. Once a proposed option is developed within the modelling water level and extent difference mapping should be presented so that any betterment can be quantified.	Baseline model files to be supplied to the EA for their consideration. The surface water modelling was undertaken to support potential betterment upstream of Cassington and has been undertaken as enhanced mitigation, commitment 10.14 within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047]. At the detailed design stage, option modelling will be undertaken (where required) to quantify the betterment provided, and this will be submitted to the EA.
RR-0308-004 Environment Agency	Buffer Zones	Issue The majority of watercourses will have a minimum buffer of 8m maintained during works to protect the feature. Impact	Clarity will be added to updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] and supporting appendices to confirm that a 10m development stand-off buffer includes the construction phase. This

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		Buffer strips less than 10m are not effective at allowing space for commuting by mammals and the maintenance of a natural river corridor. Solution Riparian buffer strips measure a minimum of 10m from the bank-top for all watercourses on the site, unless existing physical constraints prevent this, and that this is defined in the Outline CoCP. This will allow for the natural river corridor to be maintained and free movement of riparian mammals up and down the system.	will be added as an updated commitment within embedded mitigation. Buffer will be taken from the top of the banks of the watercourses. A plan will be provided to support the commitment.
RR-0308-007 Environment Agency	Unassessed Watercourses	Issue Watercourses have not been assessed due to conclusion of zero impact through the use of riparian buffers, even though easements and buffers are under 10m from the banktop (i.e. 20 within BNG riparian zone), e.g. watercourses having an 8m buffer during works. Some easements are calculated from the centreline of the channel (Appendix 10.1 Sections 2.4.23/2.5.3) Impact Threats to the environment may not be properly quantified and possible BNG uplift for watercourses may not be achieved. Solution Either conduct MoRPh surveys/River Corridor Assessments to establish correct BNG and increase the buffer/easement distance. Additional Comments BNG watercourse metric should be applied if there is a watercourse within, or in 10m proximity of, the development site Red Line Boundary (RLB) including the riparian zone. Therefore, if there are watercourses, including ditches, still within the site boundaries, a BNG watercourse assessment should be applied and watercourse metric calculated.	Clarity will be added to updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] and supporting appendices to confirm that a 10m development stand-off buffer includes the construction phase. This will be added as an updated commitment within embedded mitigation. Buffer will be taken from the top of the banks of the watercourses. A plan will be provided to support the commitment.
RR-0308-008 Environment Agency	Watercourses not properly assessed/missed from assessments	Issue The Rowel Brook is hydrologically linked to SSSI site Rushy Meadows. It also discharges into the WFD waterbody "Oxford Canal" and as such takes its WFD classification	6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] report will be updated to identify the location of the SSSI and proposed works upstream of this.

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		from that waterbody, which is currently moderate, however it has not been assessed. Impact Not properly assessing watercourses, especially those with hydrological connections to SSSI sites, could lead to damage to SSSI sites and missed opportunities for ecological uplift. Solution Assess watercourses properly.	
RR-0308-009 Environment Agency	Missing and outdated guidance and policy	Issue Some key guidance and policy documentation is missing or has been updated since issue of the ES: • The Water Supply (Water Quality) (Amendment) Regulations 2018 not cited. • Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019 not cited. 21 National Planning Policy Framework (NPPF) was updated following issue of the Environmental Statement (ES), in December 2024. The Environment Agency's Approach to Groundwater Protection, February 2018. Impact Aspects of the ES may not adequately address current guidance and policy requirements. Solution Applicant to update references in the ES and ensure any relevant changes in policy or guidance are reflected appropriately	ES will be updated to include the latest policy documentation. This will be included within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] .
RR-0308-010 Environment Agency	Hydrogeology	Issue The summary of the hydrogeological setting of the Proposed Development presented in the ES is very limited, presenting no discussion of groundwater depths (such as presented in Table 5.5 of Appendix 10.7), anticipated flows within the onsite superficial and bedrock aquifers and potential connectivity between groundwater and surface water bodies Impact Limited groundwater characterisation information is presented or discussed, such that we do not consider the	The ES will be updated to include further details of the hydrogeology regime. This will be included within 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] .

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		applicant has demonstrated a sufficient understanding of the hydrogeological setting of the site and therefore may not adequately identify all potentially significant risks posed by the development. Solution Applicant to provide greater detail with respect to the anticipated groundwater regime present within the Study Area.	
RR-0308-014 Environment Agency	Surface Water and Groundwater Abstractions	Issue The baseline identifying the surface water abstraction licences currently in the study area is incomplete. Impact Without establishing the abstraction licenses within the baseline conditions, the ES cannot properly assess the potential effects of the proposed development on water quality and water users. Solution The following abstraction licenses should be included in the baseline conditions of the hydrology and flood risk chapter. • 28/39/16/0078 – Potable Water Supply (Thames Water Utilities Ltd) • 28/39/14/0294 – Spray Irrigation (Storage) 28/39/14/0285 – Make-Up or Top Up Water (Amenity)	ES will be updated to include the noted abstraction licences. This will be included within 6.4 ES - Figure 10.12 [APP-100].
RR-0308-015 Environment Agency		Issue The applicant proposes to scope out impacts associated with temporary dewatering to enable construction, based on adherence to best practice method statements, and informed by proposed site investigation and monitoring. Impact Risk that the proposed best practice method statements may not be sufficient to protect groundwater quality from detrimental impacts. Solution We recommend that the applicant provides confirmation of the proposed scope of site investigation and monitoring, in particular in areas of the site underlain by Principal and Secondary A aquifers. We consider post-consent	Groundwater monitoring requirements are to be added to 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047]. Further ground investigation will be undertaken in line with commitment 11.2, which will inform the design of the PV array foundations. It is not expected that any dewatering will be required. However, if it is, ground water levels would be expected to recover after construction. Commitment 11.3 also relates to remediation.

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		groundwater monitoring to be important for reducing uncertainty. Additional Comments The BGS groundwater level data presented by the applicant to date (Table 5.5) is highly limited, comprising eight records and showing groundwater being absent in some exploratory holes in total and ranging from 1.70 to 18.22 metres below ground level across other locations. The data indicates groundwater levels locally within anticipated PV array foundation depth, which may necessitate temporary or permanent dewatering. This should be considered by the applicant.	
RR-0308-016 Environment Agency	Groundwater dependent terrestrial ecosystems	Issue Although the report makes brief reference to groundwater dependent terrestrial ecosystems (GWDTEs) in Section 2.2.4 and reproduces the results of chemical and quantitative GWDTE tests for the various WFD Groundwater bodies present within the study area, the report does not provide a summary of designated GWDTEs within the study area (available at GWDTEs England). Impact Potentially significant groundwater dependent ecological receptors within the study area may not be suitably identified. Solution The WFD Assessment should be amended to take account of any GWDTEs within the study area	WFD Chapter will be updated to include further details on GWDTE's. To be included within 6.5 ES - Appendix 10.7 Water Framework Directive Assessment [APP-174] .
RR-0308-017 Environment Agency	WFD Screening	Issue Matters screened in and out in Stage 1 are discussed in Table 5.4 of Appendix 10.7. Temporary dewatering to enable construction (construction phase) is screened out on the basis of adherence to best practice method statements, supported by site investigation and monitoring before, during and after dewatering and excavation activities. Pollution risk and altered drainage patterns from general construction activities (construction phase) are screened out based on adherence to best practice method statements and the temporary nature of the construction	WFD Chapter will be updated to include the temporary dewatering, pollution risk and altered drainage and creating or altering pathways to be screened in. This will be included within 6.5 ES - Appendix 10.7 Water Framework Directive Assessment [APP-174] .

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		works. Creating or altering pathways along which existing poor quality groundwater can migrate (construction phase) is screened out based on adherence to best practice method statements and the temporary nature of the construction works. The information provided by the applicant to date is indicative that groundwater may be locally present at foundation depth Impact Risk that there is insufficient characterisation of groundwater levels and flows, and of shallow ground conditions, to ensure that the proposed mitigation is sufficient to protect the Secondary A and Principal aquifers underlying the site. Solution We recommend that temporary dewatering, pollution risk and altered drainage and creating or altering pathways should be screened in for consideration in the WFD Assessment	
RR-0308-019 Environment Agency	Water Supply Strategy	Issue Water supply and demands for aspects of the construction phase of the project, such as Horizontal Directional Drilling (HDD) and dust suppression, have not been evaluated. Impact Access to water in the summer will not be possible outside of public water supply. Solution A Water Supply Strategy should be provided which provides an initial options appraisal of sources of supply, potential restrictions and plan to mitigate for water unavailability (e.g. on-site storage). Additional Comments The proposal description includes the need for HDD as a trenchless technique for the laying of below ground cables. This technique can require significant and continuous water supply which is not evaluated in the ES. Other consumptive 31 uses of water identified by the project description include dust suppression and washing.	Comment noted.

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		Surface water or groundwater abstraction will require licences determined and issued by the Environment Agency. There is a bespoke Thames licensing strategy which applies to applications for the consumptive surface water abstractions and groundwater abstractions in direct hydraulic continuity with a river or water dependent habitat features. For abstraction below 2 Megalitres per day (Ml/d), no abstraction can take place when the average of the daily mean flows of the preceding 5 days in the River Thames as gauged at Kingston is equal to or less than Q50 (1780 Ml/d). More information can be found in the Cotswolds and Thames Abstraction licensing strategies. This may have practical implications for the construction phase of the project as access to water will be limited for much of the summer season and during periods of prolonged dry weather outside of the summer. It is at the applicant's risk if the water supply has not been considered adequately. Underestimated licence determination timescales and inadequate preparation for licence conditions restricting access to water pre-commencement of construction may cause delays.	
RR00308-019 Environment Agency	Supplementary General Advice	Appendix 10.1 Flood Risk Assessment - Table 4.2 The heading within this table which states the 1 in 100 year +25% climate change scenario which is incorrect. This should be the 1 in 100 year plus 21% climate change scenario. This is a minor reporting error and will not affect outcomes but should be corrected as could be misleading. Correct this table to reference the 1 in 100 year plus 21% climate change scenario Appendix 10.1 Flood Risk Assessment - Section 3.4.29 Ordinary watercourses This section describes the climate change allowances for the Gloucestershire and the Vale management catchment, but no figure is presented within this paragraph. The higher central allowance for the Gloucester and the Vale management catchment for the 2050s epoch is 19% and for the 2080s epoch is 41%. The analysis presented in table 3.4 demonstrates that the 0.1% (1 in 1000) annual	Appendix 10.1 Flood Risk Assessment [APP-166] will be updated in line with the comments on the climate change scenario reporting. The Hydrology and Hydraulic Modelling reports will not be updated as development has instead been sequentially steered to Flood Zone 1. As such the hydraulic modelling approach has been made redundant for use in the study.

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		exceedance probability (AEP) Risk of Flooding from Surface Water is a conservative proxy for the 1% (1 in 100) AEP plus higher central climate change scenarios. The heading within this table states the 1 in 100 year plus 25% climate change scenario which is incorrect. This should be 1 in 100 year plus 19%. This is a minor reporting error and will not affect outcomes but should be corrected as could be misleading. Please correct the heading for table 3.4 to be 1 in 100 year plus 19%. Appendix 10.4 Hydrology Report Section 3.2 page 4. Update the text in the Hydrology Report regarding the catchment area as section 3.2 suggests this is 42,715 km² rather than 427.52 km². Section 3.7 page 7. Update the text within this section of the Hydrology Report as this appears to reference a catchment in Cumbria (Gaitle Burn).	
2. Local Ecology and Nature			
RR-0308-002	Water vole and surveys.	Issue: The impacts on protected species are not understood. Species-specific water vole and otter surveys have not been completed. Impact: The applicant does not provide enough evidence to assess the likely negative effects on riparian mammals. The purpose of ecology surveys is to provide baseline information presence/absence, utilisation of habitat, etc.) to determine whether a project will have a negative impact on a protected species, and to inform whether mitigation is required. Solution: Conduct otter and water vole surveys to establish the presence or absence of said species, the potential risks and any mitigation and compensation required. The surveys should follow best practice guidelines. The development should also consider potential enhancement opportunities for the species within the design. For example, potential enhancement may include habitat improvements or	Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity [APP-046], otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact. This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		connectivity of the riverine corridor through the development. Table 9.10.1 should also be updated following otter and water vole surveys if evidence of shelters are discovered, as both species may need to be monitored as part of a mitigation Licence. Additional Comments: The provision of a buffer alone is not enough to avoid potentially negative impacts to otters and water voles, due to the potential to disturb either species during construction on or near watercourses (e.g. installing watercourse crossings, riparian enhancement works, etc.). In addition by law its an offence for Riparian mammal shelters (burrows, holts and couches) are protected from disturbance.	sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean <i>et al</i> 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced.
	Loss of habitat-water vole.	Issue: Assessment of effects section does not include an assessment of the impact of temporary and permanent	As set out in section 9.6.77 of ES Chapter 9 Ecology and Biodiversity [APP-046], the potential presence of water vole on the Project site is considered by virtue

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		habitat loss during construction and decommissioning on water vole. Impact: Lack of consideration regarding the sensitivity of water voles to impacts during the construction and decommissioning stages, There are multiple records of water voles on main rivers and ordinary watercourses that are connected to the site (e.g. Rowel Brook). Solution: Amend Section 9.9 to consider the impact of construction and decommissioning on water voles.	of the consideration of their habitat within the impact assessment (i.e. water courses and water bodies). All such habitat that could be used water vole within the Project site is to be maintained with an appropriate buffer and will be protected during both construction and decommissioning. As such, there would be no impacts to water vole during these phases of development.
	Statutory Biodiversity Metric.	Issue: The BNG assessment is incorrect, The baseline habitat scores have only been calculated for on-site area and hedgerow habitats. Impact: Watercourses within the Scoping Boundary have not been assessed as part of BNG, on the basis that “none are being impacted by the project” (Section 9.1.6 oLEMP), even though watercourses may be impacted during the construction and decommissioning phases (e.g. installation of crossings, riparian works, etc.). There is also a lack of ambition with regards to leaving a measurably positive impact on watercourses following the development. Solution: Measure watercourse lengths within the scheme and use the watercourse metric to calculate baseline habitat scores and propose to achieve a BNG target of at least 10% for watercourses. Additional Comments: For potential BNG opportunities, we recommend the applicant refers to both the mitigation measures within the Water Framework Directive and opportunities identified within any Local Nature Recovery Strategies.	The Statutory Biodiversity Metric (DEFRA, 2024) is completed and appended to Appendix 9.13 Biodiversity Net Gain Assessment [APP-162]. Appendix 9.13 will be updated to include the watercourse section of the metric which will be assessed and completed for all watercourse associated units on the Project site.
	In-channel habitat enhancements.	Issue:	The delivery of the Evenlode Corridor will provide over 100ha of wet grassland habitat and other

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		Proposal to maintain existing river corridor habitat within Zone 2 (Evenlode Corridor), including marginal and aquatic planting. Impact: Not ambitious enough to only consider the riparian habitat. Proposal only appears to be focus on the River Evenlode, despite other watercourses be present within the scheme boundary (e.g. River Thames, Limb Brook, Chil Brook, etc.). Solution: The proposal needs to include in-channel habitat enhancements measures. This could be achieved through increasing the in-channel habitat diversity, improving channel morphology and removing barriers.	riparian features. The Project order limits do not include the River Evenlode channel itself and, as such, works within the channel are not being considered as part of the Corridor enhancement.
RR-0308-003	Biodiversity net gain monitoring.	Issue: Monitoring and inspection section includes a plan to conduct river condition assessments, to “ensure that the assumptions with respect to biodiversity net gain were being achieved.” Impact: The statement is contradictory to Section 9.1.6, which states that BNG is not being delivered for watercourses. Solution: Whilst we support the delivery of river condition assessments, we encourage that these are done with a plan to deliver watercourse BNG enhancements.	The Statutory Biodiversity Metric (DEFRA, 2024) is completed and appended to Appendix 9.13 Biodiversity Net Gain Assessment [APP-162]. Appendix 9.13 will be updated to include the watercourse section of the metric which will be assessed and completed for all watercourse associated units on the Project site.
RR-0308-004	Watercourse buffer zones.	Issue: The majority of watercourses will have a minimum buffer of 8m maintained during works to protect the feature. Impact: Buffer strips less than 10m are not effective at allowing space for commuting by mammals and the maintenance of a natural river corridor. Solution: Riparian buffer strips measure a minimum of 10m from the bank-top for all watercourses on the site, unless existing physical constraints prevent this, and that this is defined in the Outline CoCP. This will allow for the natural river corridor to be maintained and free movement of riparian mammals up	The use of 8m minimum buffers with respect to most watercourse through the Project is standard best practice with respect to such features. As such, this has been adopted, where it is possible to do so. This includes both within the illustrative masterplan as a design principle and also during construction to protect these features. The provision of these buffers is set out in section 8.2 of the oLEMP [APP-235] and section 1.10.12 of the outline Code of Construction Practice [APP-232].

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		and down the system.	
RR-0308-005	Vibrational Effects on Fish.	Issue: Fish have not been included in the assessment of the construction of the cable route corridor which is proposed to cross the River Evenlode and River Thames. Impact: Although Horizontal Directional Drilling is less impactful than open trench cable laying, there is still the potential for continuous noise associated with vibrations from the drilling to impact on fish species in the River Evenlode and River Thames, especially where it has been proposed to last up to one year. Impacts from noise and vibration are more likely where the drill depth is relatively shallow. Impacts on fish from noise lasting up to a year could result in fish avoiding key lifecycle habitat and thus impact on long term recruitment. Solution: An assessment on fish species from the impacts of any noise during the cable laying must be detailed in the ES. Where necessary mitigation measures should be included to make any impacts negligible and detailed in the OCEMP and CEMP. This may involve a timing restriction to avoid any key spawning or migratory periods and/or drilling to a greater depth to ensure a sufficient buffer. Additional Comments: Underwater noise or vibration may affect natural migratory fish behaviour and in extremities, kill fish. If it is assumed that noise and vibration from HDD is negligible to fish, then this needs to be backed up with evidence. Guidance on assessing the impacts on fish can be found in Sound Exposure Guidelines for Fishes and Sea Turtles (Popper et al., 2014). These guidelines provide recommendations for setting criteria (including injury and behavioural criteria) for fish. HDD would class as a continuous noise source for fish.	Even for the longest HDD under the River Thames, the period the drilling would be near or under the river would only be circa 2 weeks. As such, any vibration impact would be very short term. Notwithstanding this, at this stage, the final depths of the HDDs to be used to cross water courses has not been determined as the ground conditions are not yet known. As set out in section 3 of ES Appendix 6.2 Cable Laying Methodology and HDD Crossing Locations [APP-130], the depth of the HDD could be between 1.5 and 30m. The final depth will therefore be chosen to ensure that there are no potential vibration impacts to water courses once the ground conditions (and therefore transmission of vibration) has been determined.

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	Electromagnetic Fields- fish.	Issue: Fish have not been included in the assessment of the operation of the cable route corridor which is proposed to cross the River Evenlode and River Thames. Impact: Electromagnetic fields (EMFs) emitted from high voltage cables can have behavioural impacts and impacts on fish egg development. Solution: Appropriate measures are to be put in place by the developer, so that EMFs are not detectable by fish from the installation of underground cables. Additional Comments: Studies have found EMF's can affect individual organisms during embryonic and larval stages. Lamprey spp. (present in the River Thames and Evenlode), spend their juvenile stages on the bed of the river (normally in silty areas). As such this could lead to localised impacts on any fish near the power cables, where there could be an increase in EMF. Additionally, the behaviour of migratory species (brown/sea trout, European eel) present in the River Thames and Evenlode may be impacted by any increase in EMF. It is noted that shielding of cables and depth of cables under the watercourse may offer suitable mitigation.	All cables will be appropriately shielded typically using metallic sheaths or armouring as per industry standards to prevent increase in EMF.
RR-0308-023	Legislation.	Volume 1 Chapter 9: Ecology and Nature Conservation: 9.2: Environmental legislation does not list some recent (2024) legislation pertaining to BNG. The following should be included: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, for completeness.	Volume 1 Chapter 9: Ecology and Nature Conservation: 9.2 [APP-046] has been updated to include Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.
3. Ground Conditions			
	Legislation	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: Some key guidance and policy documentation is missing or has been updated since issue of the ES: • The Water Supply (Water Quality) (Amendment) Regulations 2018 not cited.	Regulation Amendments were omitted from the Chapter however the inclusion of these amendments will not alter the assessment presented within the Chapter.

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019 not cited. National Planning Policy Framework (NPPF) was updated following issue of the Environmental Statement (ES), in December 2024. The Environment Agency's Approach to Groundwater Protection, February 2018. Impact: Aspects of the ES may not adequately address current guidance and policy requirements. Solution: Applicant to update references in the ES and ensure any relevant changes in policy or guidance are reflected appropriately.	The update of the NPPF post-dated preparation of the Chapter however as above the updates will not alter the assessment presented. Reference to the EA's Approach to Groundwater Protection will be included as part of the SoCG with the EA.
	Hydrogeology	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: The summary of the hydrogeological setting of the Proposed Development presented in the ES is very limited, presenting no discussion of groundwater depths (such as presented in Table 5.5 of Appendix 10.7), anticipated flows within the on-site superficial and bedrock aquifers and potential connectivity between groundwater and surface water bodies. Impact: Limited groundwater characterisation information is presented or discussed, such that we do not consider the applicant has demonstrated a sufficient understanding of the hydrogeological setting of the site and therefore may not adequately identify all potentially significant risks posed by the development. Solution: Applicant to provide greater detail with respect to the anticipated groundwater regime present within the Study Area.	The desk-based assessment undertaken is considered sufficient to determine the relative risk to groundwater. The ground investigation to be undertaken under Commitment 11.2 will provide further site-specific data which will allow the risk levels determined within the Preliminary Risk Assessment to be refined through further development of the Conceptual Site Model and risk assessment.
RR-0308-011	Sensitive Criteria	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: Listed receptors do not clearly differentiate between private or public groundwater abstractions or groundwater abstraction Source Protection Zones (SPZs).	The sensitivity of groundwater abstractions (licensed or PWS) will be based on the source unit (aquifer classification) and importance of the resource as defined by DMRB criteria used in Table 11.9.

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		Impact: No clear metric by which to judge the risk posed to sensitive groundwater abstractions by the Scheme is presented in the report. Solution: Update Table 11.9 to include the relative sensitivity of Groundwater SPZs and public and private groundwater abstraction boreholes.	
RR-0308-012	Maximum Design Scenario	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: Maximum Design Scenario (MDS) does not include potential for mobilisation of leachate / leachable contaminants from identified sources except the potentially infilled sand pit in land parcel 9. No consideration of leachate / leachable contaminant impact on groundwater quality resulting from construction / decommissioning activities at potential contamination source Hensington Cutting Landfill Site, although potential hazardous gas migration from this feature is considered. Trenching through the landfill or HDD below the base of the landfill could result in the creation of a preferential migration pathway for mobile contamination. Impact: No consideration of leachate / leachable contaminant impact on groundwater quality resulting from construction / decommissioning activities at potential contamination source Hensington Cutting Landfill Site, although potential hazardous gas migration from this feature is considered. Trenching through the landfill or HDD below the base of the landfill could result in the creation of a preferential migration pathway for mobile contamination. Solution: Include MDS for mobilisation of leachate/leachable contaminants from Hensington Cutting Landfill Site in Table.	It is expected that the MDS for this scenario would be through trenching and this pathway may be added to the creation of new pathways line item for land parcel 15. Should the selection of HDD be progressed it is expected that this will be below the landfill mass and its construction will be supported by the findings of the ground investigation (and subsequent risk assessment) (Commitment 11.2).
RR-0308-013	Mitigation measures – contamination and remediation	Volume 1 Chapter 11: Ground Conditions [APP-048] Issue: Commitments 11.5, 11.6 and 11.8 of the table relate to the prevention of pollution during the Project. These do not	Commitment 11.3 requires a Remediation Strategy be prepared should ground investigation or any discovered contamination (and subsequent risk assessment) determine that remediation is required.

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		include a commitment to remediate contamination should this occur. Impact: Potential for contamination to impact groundwater quality if suitable remediation is not carried out. Solution: Applicant should include a plan to carry out remediation activities should contamination impacts occur during construction or other activities during the lifetime of the Scheme. A requirement regarding this issue is necessary. Please see Issue ref. EAREQ-006 below	
RR-0308-013	Sources of contamination	Volume 3 Appendix 11.1 to 11.13 [APP-175 to 194] Issue: The reports do not consider new sources of contamination relating to future land use, i.e. the construction, operation and decommissioning of the Proposed Development Impact: Potential impacts from new contamination sources relating to the proposed development may not be suitably assessed and mitigated. Solution: The applicant should consider possible sources of contamination associated with agricultural land use, and new sources of contamination associated with the construction, operation and decommissioning of the Proposed Development in the PRA. Additional Comments: The reports present potential pollutant sources identified for each respective Land Parcel. This incorporates current and historic sources of contamination but does not consider new sources relating to future land use and does not consider the potential for diffuse or localised sources of contamination associated with historic or current agricultural land use. The reports do however state that the presence of unknown soil contamination being discovered during construction works cannot be entirely discounted and	The principal purpose of the DTS and PRA reports is to determine the geo-environmental risks in relation to the proposed development utilising existing baseline conditions with regard to the environmental setting and the potential for contamination to exist as a result of historical and current land use / activities. It follows the Source-Pathway-Receptor approach set out under Part 2A of the Environmental Protection Act 1990. The potential for new sources of contamination resulting from the development is not the remit of these studies. The potential for new contamination to arise as a result of construction/decommissioning of the project and its operation/maintenance is considered within Section 11.9, Volume 1 Chapter 11: Ground Conditions [APP-048]. The principal mitigation measures to be adopted are the implementation of the CoCP and standard Operational Procedures.

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		recommend that works stop and specialist advice should be obtained about how to proceed in this instance.	
RR-0308-018	Groundwater receptors	Volume 3 Appendix 11.1 [APP-175] Issue: Many of the PRAs appended to the ES conclude that while superficial deposits and shallow or outcropping bedrock for many of the Land Parcels include Primary and/or Secondary A aquifers, representing potentially significant receptors, due to the absence of identified abstractions and SPZs within the search buffer these have been assigned low sensitivity. The Principal and Secondary A aquifers are receptors in their own right, regardless of the presence or absence of abstractions and must be protected from contamination. Furthermore, it is likely that there is significant interaction between groundwater and surface water on many of the Land Parcels, evidenced by the presence of small bodies of standing water across the site 'rises' and 'springs' shown on OS maps at various locations. This indicates that surface water bodies could be impacted by groundwater contamination in the absence of abstraction. Impact: Potential for improper mitigation of impacts to groundwater receptors based on underestimation of risks posed by the Proposed Development Solution: We expect these groundwater receptors to be considered as moderately to highly sensitive going forward. The applicant should revisit the PRA, assigning appropriate sensitivity to aquifer groundwater receptors.	The risks applied within the PRA are determined using professional judgement and are based on the Source-Pathway-Receptor approach set out under Part 2A of the Environmental Protection Act 1990. The ground investigation to be undertaken under Commitment 11.2 will provide site-specific data which will allow the risk levels determined within the Preliminary Risk Assessment to be refined through development of the Conceptual Site Model and further risk assessment. Groundwater receptors will be considered sensitive receptors within the preparation of the CoCP, including the PPP and construction drainage design, which will provide appropriate mitigation.
RR-0308-018	Contamination from off-site sources	Volume 3 Appendix 11.4 [APP-179] Issue: Section 3.2.5 lists Oxford Airport (30m N/NE of Land Parcel 11) as a potential source of contamination particularly with regard to oils, fuels and spills/leaks associated with the runway. The report does not mention the potential for the presence of PFAS contamination associated with firefighting foams. The report asserts in Section 3.2.9 that	We note the potential for PFAS contamination to be present within groundwater as a result of any firefighting foams used at the airport. We note the likely groundwater flow direction from Oxford Airport to the south onto site. The foundations anticipated for the solar arrays are likely to be shallow and the potential for vertical

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		shallow groundwater flow direction is likely to be toward the north, however a review of local topography indicates a gentle slope downward from the offsite Oxford Airport toward Parcels 5, 11 and 6. These are indicated on our records to be directly underlain by outcropping bedrock designated as Secondary A aquifer, with Oxford Airport underlain by either the same outcropping Secondary A aquifer or superficial Secondary A aquifers. The Preliminary Conceptual Site Model presented in Table 3.1 does not consider possible impacts to on-site groundwater quality from Oxford Airport / the historic WII airbase. We consider the potential for transmission of contaminants from the airport via shallow or deep groundwater cannot be discounted at this time. Note that a spring is evident on historic Ordnance Survey maps provided as an appendix to the PRA which shows the presence of a spring immediately adjacent to Land Parcel 11 at approximate NGR 446800, 214350 and apparently discharging into Rowel Brook. Impact: Potential for impacts from offsite contamination sources not to be identified, which may be exacerbated by the construction of the Proposed Development if unmitigated. Solution: Recommend that the applicant should reassess the likely groundwater regime within the site and the potential for contaminative impact from offsite sources; in particular, Oxford Airport.	migration of contaminants within any shallow groundwater present to deeper units is limited. Notwithstanding this the ground investigation to be undertaken under Commitment 11.2 will provide site-specific data which will allow the risk levels determined within the Preliminary Risk Assessment to be refined through development of the Conceptual Site Model and further detailed risk assessment. Additionally the Discovery Strategy to be implemented during construction (Commitment 11.1) will include details regarding the visual/olfactory indicators and strategy for dealing with the potential presence of PFAS contamination.
RR-0308-018	Groundwater receptor sensitivity	Volume 3 Appendix 11.1 [APP-175] Issue: The PRA concludes in Section 3.2.9 that the Secondary A aquifers associated with bedrock are considered to be a sensitive receptor, but that as there are no groundwater abstractions within and SPZs within 500m these are considered to be low sensitivity. These receptors are considered within the outline Conceptual Site Model presented in Table 3.1 and assigned a qualitative risk rating of 'Low', based on risk from historic/current land use, however the basis for this determination is unclear.	The risk levels applied within the PRA are determined using professional judgement and are based on the Source-Pathway-Receptor approach. The ground investigation to be undertaken under Commitment 11.2 will provide site-specific data which will allow the risk levels determined within the Preliminary Risk Assessment to be refined through development of the Conceptual Site Model and further risk assessment. Groundwater receptors will be considered sensitive receptors within the preparation of the CoCP,

RR Ref No	Subject Matter	Comments from Relevant Representations	Response to Relevant Representation
		Impact: Potential for inadequate mitigation of impacts to groundwater receptors based on underestimation of risks posed by Proposed Development. Solution: We expect these groundwater receptors to be considered as moderately sensitive going forward. The applicant should revisit the PRA including the CSM, assigning appropriate sensitivity to aquifer groundwater receptors. Additional Comments: We are pleased to see that the risk posed to Secondary A aquifers by contamination associated with the onsite historic Hensington Railway Cutting landfill site, has been assigned a 'Moderate' Qualitative Risk Rating, on the basis that there is a potential risk of the creation of a preferential contamination migration pathway for leachate mobilisation, indicating that further assessment is required. However, the derivation process for this rating is not clear in the report. The Secondary A aquifers are receptors in their own right, regardless of the presence or absence of abstractions and must be protected from contamination.	including the PPP and construction drainage design, which will provide appropriate mitigation.
4. DCO Process			
RR-0308	Consents Strategy	It is recommended that a consents strategy is included in submissions. This is to ensure all parties are clear (including the public) what permits and consents are required and for what areas.	The Consents and Licences Required under Other Legislation Document submitted with the DCO Application [APP-035] lists those consents that the Applicant anticipates being required either within the draft DCO or as consents and licenses to be sought separately. To the extent any further consents become required due to unforeseen circumstances, the Applicant will keep the Examining Authority up to date on whether such further consents are intended to be wrapped into the draft DCO or will be sought separately (as necessary).



Botley West Solar Farm

Applicant Responses to Relevant Representations - GTC
Pipelines Ltd [RR-0372]

June 2025

PINS Ref: EN010147
Document Ref: EN010147/APP/11.4

I. Applicants' Comments in response to the Relevant Representation submitted by GTC Pipelines Ltd [RR-0372]

Comments from Relevant Representations	Response to Relevant Representation
Having checked the order limits of the solar farm, I can confirm there is one area of the cable route corridor that may well be affecting existing GTC gas infrastructure. Please contact us on the provided contact details to receive the asset plans and location map to decide whether or not the cable route will be affecting the gas pipeline and therefore to start the diversion process.	The Applicant has been in contact with GTC Pipelines Ltd since the submission of this RR and has received a response with additional information regarding gas networks that may interact with the Project. The Applicant's technical team is considering the new information provided by GTC Pipelines and will respond in due course. In the meantime, the Applicant has included a standard set of protective provisions for the benefit of Electricity, Gas, Water and Sewerage Undertakers at Part 1 of Schedule 15 of the draft DCO [AS-009]. The Applicant considers that those standard protective provisions are sufficient given the nature of the potential interactions with GTC Pipelines.



Botley West Solar Farm

Applicant Responses to Relevant Representations –
Historic England [RR-0398]

June 2025

PINS Ref: EN010147
Document Ref: EN010147/APP/11.4

I. Applicants' Comments in response to the Relevant Representation submitted by Historic England [RR-0398]

Table I-1: Applicants' Comments on Relevant Representations

Comments from Relevant Representations	Response to Relevant Representation
1. Historic Environment	
In relation to the HIA (Volume 3 Appendix 7.4), whilst the current document is much improved, we feel there is further work needed. It does not yet take account of or directly address the concerns outlined by the ICOMOS Technical Review, regarding the Botley West proposals, which also highlights concerns about cumulative impact with regards to applications for housing within Blenheim's setting. Furthermore, the conclusions are yet to be supported by a comprehensive set of high-quality visualisations to corroborate the results of the ZTV, which states there would be some visibility of the Project Site from land within the Blenheim Palace WHS (1.4.39). We have agreed additional viewpoints with the applicants, who will provide these as the examination progresses. We will review this information when submitted and comment as appropriate.	The Applicant acknowledges Historic England's comments regarding the Heritage Impact Assessment produced in respect of the Blenheim Palace World Heritage Site (ES Appendix 7.4, [APP-141]). An updated version of the Heritage Impact Assessment, including the additional visualisations from the viewpoints agreed with Historic England, will be submitted into the Examination as soon as possible.
The HIA has also yet to demonstrate the decision-making process and evidence to explain the decisions about the land parcels that have been included and the methodology used to demonstrate how the sensitivity level of that land was decided upon. Whilst the focus of the mapping is on the impact to the WHS, a similar map for the impact to other designated heritage assets impacted by these proposals should also be produced.	The Applicant will include information regarding the decision-making process regarding the inclusion of land parcels within the next version of the Heritage Impact Assessment. This document focuses on the Blenheim Palace World Heritage Site and the assessment has been undertaken in accordance with specific guidance from UNESCO which applies to World Heritage Sites, therefore it would not be a suitable document in which to include heat sensitivity maps regarding other designated heritage assets. The assessment of likely impacts and effects of the Project on the heritage significance of other designated heritage assets as a result of change within their setting is presented in ES Appendix 7.5: Settings Assessment [APP-142]. The Applicant considers that the methodology used for that assessment is in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>, and that the production of heat sensitivity maps for any of these assets is not necessary in order for the assessment to be undertaken. However, some of the additional visualisations

Comments from Relevant Representations	Response to Relevant Representation
	from the viewpoints agreed with Historic England relate to designated heritage assets outside the Blenheim Palace World Heritage Site. Consequently, these visualisations will be reproduced within an annex to ES Appendix 7.5: Settings Assessment [APP-142] and an updated version of that ES Appendix will be submitted into the Examination at a suitable Deadline.
In chapter 7 of the Preliminary Environmental Information Report, the requirement to undertake further archaeological evaluation following geophysical survey was acknowledged and it was stated that the programme of further evaluation would be carried out for the Environmental Statement. We understand that a programme of archaeological field evaluation through trial trenching is being carried out. An outline Written Scheme of Investigation has been included in the application documents (EN010147/APP/7.6.5) in which it is now stated that reports on the trial trenching will be submitted to the examination of the DCO application at the earliest opportunity. We will review this information when submitted and comment as appropriate.	A programme of trial trenching has been undertaken within much of the Order Limits, with a total of 885 trenches being excavated and recorded. The locations of all trenches, and the methodologies deployed for the fieldwork and recording, were agreed in advance with the Lead Archaeologist at Oxfordshire County Council. The reports on the results of this programme of trial trenching are being prepared and will be submitted into the Examination as soon as possible. A second phase of trial trenching will examine land within the proposed cable routes where these are outside the three main areas. The locations of these trenches will be agreed in advance with the Lead Archaeologist at Oxfordshire County Council. A further 32 trenches within the Central Site Area will also be excavated and recorded within this second phase of trial trenches. These are ones where the locations have been agreed with the Lead Archaeologist at Oxfordshire County Council but where the work could not be undertaken as part of the previous programme due to poor ground conditions. The Outline Written Scheme of Investigation [CR1-005] sets out a proposed programme of further archaeological investigation to be undertaken in the event of the DCO being granted. This programme would include completion of the second phase of trial trenching described above, if it has not been possible to complete this work before the Examination has concluded. Requirement 10 in Schedule 2 of the Draft Development Consent Order [AS-010] establishes that no part of the development could commence until an archaeological written scheme of investigation for that part has been agreed with the relevant planning authority. The written scheme of investigation must be substantially in accordance with the Outline Written Scheme of Investigation [CR1-005].
Following the recent acceptance of this DCO, Historic England will ensure that any appropriate correspondence to the UK State Party from UNESCO regarding the proposed scheme will also be submitted to the Planning Inspectorate to inform the Examination.	The Applicant acknowledges the role of Historic England on behalf of the UK State Party and looks forward to seeing copies of any correspondence on this matter.

Comments from Relevant Representations	Response to Relevant Representation
We note that the proposals include the option for the new Botley West National Grid (NGET) Substation within the order limits of the southern section of the development site, otherwise it would be provided on land just outside the southern section of the development. Providing these remain the only locations for the Substation we have no comment to make on heritage grounds.	The Applicant can confirm that at this stage, these are the only potential locations for the new Botley West National Grid (NGET) Substation. However, if any other locations are identified these would equally need to be assessed any potential impacts appropriately managed.
We will also comment on the assessment of the grade I and II* listed buildings, grade I and II* registered parks and gardens (RPG) and scheduled monuments across the whole development site, but will otherwise defer advice on grade II listed buildings and conservation areas to the local planning authorities (Cherwell, West Oxfordshire and Vale of White Horse District Councils).	The Applicant notes that advice regarding Grade II listed buildings and Conservation Areas will primarily be provided by the relevant local planning authorities.
With regards to the central part of the application site our principal concern relates to the harmful impact upon the Outstanding Universal Value (OUV) of the Blenheim World Heritage Site and the significance of the Blenheim grade I Registered Park and Garden (NHLE 1000434) and grade II listed Blenheim Palace (NHLE 1052912) through development in their setting. Based on the information available, Historic England considers that the majority of the Botley West Solar Farm would not affect the OUV of Blenheim. The exception to this is within the Central section, where some field parcels, due to their proximity and intervisibility with the boundary of Blenheim, make a particularly strong contribution to being able to experience the estate set within its rural countryside. The appearance of large-scale solar arrays in these field parcels would erode the aesthetic value that connects Blenheim with its setting. In this case, the transition from traditional rolling countryside to shelterbelt, and the way that views from surrounding fields help provide an understanding of the park's context (which contributes to attribute 7) would be eroded. The proposals would change the context the WHS, and the ensemble of the RPG and Palace, would be experienced within.	The Heritage Impact Assessment produced in respect of the Blenheim Palace World Heritage Site (ES Appendix 7.4, [APP-141]) examines the likely impact of the proposals on the OUV of the Blenheim Palace WHS. The Heritage Impact Assessment identified a likely 'minor negative' impact on one attribute (Attribute 7) of the OUV. This terminology is taken from the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>). The overall assessment of likely impacts and effects of the Project on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4, [APP-141]). The impact would be long-term (time-limited) and fully reversible. The sensitivity/value of the WHS is determined as 'very high', resulting in a likely effect of 'minor adverse' significance, which is not significant in EIA terms. The Applicant notes that in their Relevant Representation, Historic England does not disagree with the Applicant's assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4, [APP-141]), as well as the overall

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Solar panels in the fields marked 2.1, 2.2, 2.5, and 2.20-2.26 in Figure 2b within ES Appendix 7.1: Historic Environment Desk-based Assessment (EN010147/APP/6.5) would detract from the traditional character of the countryside and its relationship with the historic park as conveyed in Attribute 7, and therefore harm Blenheim's OUV and the significance of the ensemble of the RPG and the Palace. We recommend that solar panels on these fields are removed from the scheme. ICOMOS was also similarly concerned with maintaining the character of the surrounding landscape in its 2024 Technical Review.

In NPS terms we consider the proposals would harm the OUV of Blenheim WHS and the significance of Blenheim Palace and RPG. In each case the harm would be less than substantial, and modest in degree. In the Settings Assessment (EN010147/APP/6.5), with respect to the impact on the RPG (1.9.27), the impact was assessed as negligible adverse. In our view, the impact is greater than negligible.

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assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment [**CR1-003**].

The Applicant notes Historic England's concerns regarding the placement of solar PV panels within specific fields that form part of the setting of the Blenheim Palace WHS, and will continue to work with Historic England towards avoiding or further reducing any impacts on the WHS.

The Applicant notes Historic England's comment regarding the likely impact on the heritage significance of the Grade I listed Blenheim Palace. The assessment of the likely impact on this designated heritage asset is included as part of the overall assessment on the OUV of the Blenheim Palace WHS presented within the Heritage Impact Assessment (ES Appendix 7.4, [**APP-141**]).

The Applicant notes Historic England's comment regarding the likely impact on the heritage significance of the Grade I Registered Park and Garden at Blenheim Palace. The assessment of the likely impact on the heritage significance of this designated heritage asset is presented within paragraphs 1.9.23 – 1.9.27 of ES Appendix 7.5: Settings Assessment [**APP-142**]. This concludes that the likely impact would be greatest at the time of construction, reducing over time as new planting designed to screen views of the proposed development reaches maturity.

The Applicant has assessed that the heritage significance of the Registered Park and Garden would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be long-term (time-limited) and fully reversible. For the magnitude of impact to be greater than 'negligible adverse' (as suggested by Historic England), the heritage significance of the Registered Park and Garden would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. However, the Applicant will continue to work with Historic England towards avoiding or further reducing any impacts on the heritage significance of the Blenheim Palace Grade I Registered Park and Garden.

The Applicant acknowledges Historic England's statement that any harm to the heritage significance of the Blenheim Palace World Heritage Site, the Grade I listed Blenheim Palace, and the Grade I Blenheim Palace Registered Park and

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Garden would be less than substantial with regard to the terminology used in national planning policy. As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test.

The scheduled Roman site at Sansom's Platt is now accepted to be the site of a Roman settlement associated with Akeman Street. The photomontages from viewpoint 9 make clear that the development will be highly visible from the scheduled monument (EN10147/APP/6.4) (figure 8.265). Although the panels and fencing in this view will be screened by year 15, for a significant part of the life of the development they will remain visible. As a modern intrusion, they will detract from the significance of the monument through the impact upon the appreciation of the rural surroundings of this Roman settlement. In the Settings Assessment (EN010147/APP/6.5), with respect to the impact on the scheduled monument (1.9.4), the impact is assessed as negligible adverse. In our view, the impact is greater than negligible.

We note also that geophysical survey shows that the settlement may extend beyond the scheduled area in all directions (Settings Assessment, 1.9.6). We understand that trial trenching has been carried out around the scheduled monument, but without the results of that trenching it is not possible to be sure of the true extent. Should the remains beyond the scheduled area be found to be of national importance, we may revise our assessment of the impact upon the setting of the whole settlement.

The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Scheduled Monument at Sansom's Platt is presented within paragraphs 1.9.4 – 1.9.14 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment included a review of visualisations from Viewpoints 9, 10 and 11 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 9 are presented as Figures 8.264 – 8.267 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 2 of 9 [APP-073]. The visualisations from Viewpoint 10 are presented as Figures 8.268 – 8.271 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 2 of 9 [APP-073]. The visualisations from Viewpoint 11 are presented as Figures 8.272 – 8.275 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 3 of 9 [APP-074].

The Applicant's detailed assessment presented within paragraphs 1.9.4 – 1.9.14 of ES Appendix 7.5: Settings Assessment [APP-142] concludes that the likely impact would be greatest at the time of construction, reducing over time as new planting designed to screen views of the proposed development reaches maturity. The heritage significance of the Scheduled Monument would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be long-term (time-limited) and fully reversible. For the magnitude of impact to be greater than 'negligible adverse' (as suggested by Historic England), the heritage significance of the Scheduled Monument would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. The greatest part of the heritage significance of the Scheduled Monument lies in its evidential values, with the potential recovery of information retrieved through examination of the buried archaeological features. These values would not be affected in any way by the proposed development. The setting of the Scheduled Monument makes some contribution towards its heritage significance, especially the presence of the Roman road (Akeman Street) which is directly adjacent to the Scheduled area. The relationship between Akeman Street and the Scheduled Monument would not be affected by the proposed development.

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Historic England refer to the photomontages from Viewpoint 19, stating that *'Although the panels and fencing in this view will be screened by year 15, for a significant part of the life of the development they will remain visible'*. The visualisation for Winter Year 1 is presented as Figure 8.264 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 2 of 9 [APP-073], with the visualisation for Summer Year 15 presented as Figure 8.266 in the same document. The Applicant considers that the edge of the proposed development has been pulled back from the Scheduled Monument such that an effective buffer zone has been established. The visualisation for Winter Year 1 would change as the new planting matures, to the extent shown in the visualisation for Summer Year 15 in which the proposed development is fully screened. However, this change is gradual and therefore the initial views of the proposed development would not continue right through until the establishment of the Summer Year 15 view. The Applicant therefore does not agree with Historic England's assertion that the proposed panels and fencing would remain visible *'for a significant part of the life of the development'*.

A programme of trial trenching has been undertaken in the land around the Scheduled Monument. The reports on the results of this programme of trial trenching are being prepared and will be submitted into the Examination as soon as possible.

The central part of the Botley West Solar Farm would harm the significance of the Church of St Peter and St Paul, Church Hanborough (grade I: NHLE 1052991). This is an early twelfth century church, which is a prominent landmark in Church Hanborough and the surrounding area. The church's elevated position and very fine tall spire give the church its landmark qualities: it can be seen on the skyline throughout the traditional agricultural landscape around Church Hanborough, which contributes to its significance as a rural place of worship.

The proposed development would change that experience when travelling south and east of the church and the village. Traditional agricultural fields in the foreground would be replaced by the solar array. This would not disrupt views of the church spire, and its landmark qualities, but it would erode the character of the church within its traditional open agricultural setting.

The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough is presented within paragraphs 1.9.27 – 1.9.31 of ES Appendix 7.5: Settings Assessment [APP-142]. The assessment included a review of visualisations from Viewpoints 27 and 38 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 27 are presented as Figures 8.312 – 8.315 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 5 of 9 [APP-076]. The visualisations from Viewpoint 38 are presented as Figures 8.336 – 8.339 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 7 of 9 [APP-078].

The Applicant's detailed assessment presented within paragraphs 1.9.27 – 1.9.31 of ES Appendix 7.5: Settings Assessment [APP-142] concludes that the proposed development would not preclude any existing views towards the church and the spire would remain visible as at present. However, elements of

Comments from Relevant Representations

In NPS terms, this would harm the significance of the church. The harm would be less than substantial and modest in degree. Careful consideration should therefore be given as to how best to address this impact. In the Settings Assessment (EN010147/APP/6.5), the impact on the church is assessed as negligible adverse, however in our view, the impact is greater than negligible.

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the Project would be visible in the foreground and middle ground in such views and consequently the setting of the church as experienced in these views would change from the predominantly rural situation as at present. The heritage significance of the church would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be long-term (time-limited) and fully reversible. For the magnitude of impact to be greater than 'negligible adverse' (as suggested by Historic England), the heritage significance of the church would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. The greatest part of the heritage significance of the church lies in its historical and evidential values, with the potential recovery of information retrieved through examination of the fabric of the building or relevant documentary sources. These values would not be affected in any way by the proposed development. The setting of the church makes a reasonable contribution to its heritage significance, especially the enclosing churchyard and the associated burial monuments. The relationship between the church and the churchyard would not be affected by the proposed development.

The Applicant acknowledges Historic England's statement that any harm to the heritage significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough would be less than substantial with regard to the terminology used in national planning policy. As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test.

The significance of the Church of St Peter's, Cassington (Grade I: NHLE 1367949), an early twelfth century church, would also be harmed. Cassington sits on relatively flat lowland, however the undulating landscape surrounding the village offer vantage points in which views towards the village, and St Peter's broach spire, can be appreciated. Due to the landscape depression the church sits within, the spire is not seen against clear sky, but instead against a backdrop of agricultural fields.

The proposed development would change those agricultural fields behind the church spire to solar development. In these views, whilst the church spire would remain visible, the development would erode the church's traditional agricultural context. The ordered rows of solar panels would also make it slightly more

The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Grade I listed Church of St Peter at Cassington is presented within paragraphs 1.9.32 – 1.9.34 of ES Appendix 7.5: Settings Assessment **[APP-142]**. The assessment included a review of visualisations from Viewpoints 42 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 42 are presented as Figures 8.348 – 8.351 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 8 of 9 **[APP-079]**.

The Applicant's detailed assessment presented within paragraphs 1.9.32 – 1.9.34 of ES Appendix 7.5: Settings Assessment **[APP-142]** concludes that the proposed development would not preclude any existing views towards the church and the spire would remain visible as at present. However, elements of the Project would be visible in behind and adjacent to the church tower in some

Comments from Relevant Representations

difficult to appreciate the silhouette of the spire, when compared to the existing backdrop of patchwork fields.

The effect of the proposed development, in NPS terms, would be to harm the significance of the church. The harm would be less than substantial harm, and modest in degree. There therefore needs to be careful consideration as to how best to address this impact. In the Settings Assessment (EN010147/APP/6.5), the impact on the church is assessed as negligible adverse, however in our view, the impact is greater than negligible.

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views and consequently the setting of the church as experienced in these views would change. The heritage significance of the church would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be long-term (time-limited) and fully reversible. For the magnitude of impact to be greater than 'negligible adverse' (as suggested by Historic England), the heritage significance of the church would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. The greatest part of the heritage significance of the church lies in its historical and evidential values, with the potential recovery of information retrieved through examination of the fabric of the building or relevant documentary sources. These values would not be affected in any way by the proposed development. The setting of the church makes a reasonable contribution to its heritage significance, especially the enclosing churchyard and the associated burial monuments. The relationship between the church and the churchyard would not be affected by the proposed development.

The Applicant acknowledges Historic England's statement that any harm to the heritage significance of the Grade I listed Church of St Peter at Cassington would be less than substantial with regard to the terminology used in national planning policy. As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test.

The significance of the Church of St Michael, Begbroke (Grade II*: NHLE 1291232), a late twelfth century parish church, would also be harmed. The church is situated to the northern edge of the village and can be seen from the agricultural fields. Whilst the church tower is part screened by trees, it is visible in views from the fields to the north. These fields provide a countryside setting for the church, which contributes to its significance as a rural place of worship. From these fields, the church can be seen alongside the former St Philip's Priory and Church, and together these have group value in being a focal point in the landscape and indicating that the viewer is approaching an important ecclesiastical complex.

The proposed development would erode that agricultural setting to a small degree. The effect of the proposed development, in NPS terms, would be to harm the significance of the church. The harm

The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Grade II* listed Church of St Michael at Begbroke is presented within paragraphs 1.9.39 – 1.9.41 of ES Appendix 7.5: Settings Assessment [APP-142]. This concludes that the setting of the church as experienced in some views would change. The heritage significance of the church would be 'barely harmed', resulting in a 'negligible adverse' magnitude of impact that would be long-term (time-limited) and fully reversible. For the magnitude of impact to be greater than 'negligible adverse' (as suggested by Historic England), the heritage significance of the church would have to be 'slightly harmed' or 'clearly harmed'. Whilst it is recognised that these terms are subjective, the Applicant maintains that 'barely harmed' is the correct assessment. The greatest part of the heritage significance of the church lies in its historical and evidential values, with the potential recovery of information retrieved through examination of the fabric of the building or relevant documentary sources. These values would not be affected in any way by the proposed development. The setting of the church makes a reasonable

Comments from Relevant Representations

would be less than substantial harm, and modest in degree. In the Settings Assessment (EN010147/APP/6.5), the impact on the church is assessed as negligible adverse. In our view, the impact is greater than negligible.

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contribution to its heritage significance, especially the enclosing churchyard and the associated burial monuments. The relationship between the church and the churchyard would not be affected by the proposed development.

The Applicant acknowledges Historic England's statement that any harm to the heritage significance of the Grade II* listed Church of St Michael at Begbroke would be less than substantial with regard to the terminology used in national planning policy. As such, the test set out in paragraph 5.9.32 of NPS-EN1 is the relevant test.



Botley West Solar Farm

Applicant Responses to Relevant Representations -
Ministry of Defence- Defence Infrastructure Organisation
(DIO) [RR-0724]

June 2025

PINS Ref: EN010147

Document Ref: EN010147/APP/11.4

I. Applicants' Comments in response to the Relevant Representations submitted by Ministry of Defence- Defence Infrastructure Organisation (DIO) [RR-0724]

Table I-1: Applicants' Comments on Relevant Representations

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
1. Consultation Process			
RR-0724	Ministry of Defence – Defence Infrastructure Organisation (DIO)	The application site for this proposal occupies statutory safeguarding zones surrounding RAF Weston on the Green, specifically the aerodrome height and birdstrike safeguarding zones and the aerodrome height safeguarding zone surrounding RAF Brize Norton. The MOD acknowledge that this scheme is at the pre-application stage and full details of the development are not yet finalised. However, given the significant size of the proposed solar farm, the MOD would wish to be consulted at all future stages of this scheme leading to the finalised development proposals in order to assess for any impacts to defence operations from the development. The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents provided in support of the application for Botley West Solar Farm and the documents and supporting information provided on the Planning Inspectorate website as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.	The Applicant acknowledges the DIO's comments, in particular in relation to safeguarding, and will continue to consult the DIO in relation to the developing design, including the potential for any formal Change Requests to the ExA, and in relation to the discharge of Requirements associated with the DCO. The Applicant also acknowledges the need for the DIO to consider any variations and their potential impacts on defence operations, and is using Pager Power to support its position on design and relationship to safeguarding.



Botley West Solar Farm

Applicant Responses to Relevant Representations - Natural
England [RR-0761]

June 2025

PINS Ref: EN010147
Document Ref: EN010147/APP/11.4

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I. Applicants' Comments in response to the Relevant Representation submitted by Natural England [RR-0761]

Table I-1: Applicants' Comments on Relevant Representations

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
1. Local Ecology and Nature			
RR-0761-001	Internationally and Nationally Designated Sites	Internationally Designated Sites Two internationally designated sites have been identified as subject to potentially likely significant effects from this proposal. We agree the scope of the HRA Screening exercise was appropriate. Cothill Fen Special Area of Conservation (SAC) Natural England agree with the conclusions within Environmental Statement (ES): Appendix 9.14 Habitats Regulations Assessment (HRA) Report (November 2024) [APP-163] on Cothill Fen SAC. The site is screened out from further HRA. Oxford Meadows SAC Air Quality In our Section 42 Consultation Response we raised the issue of air quality impacts (section 1.2.1). We note that an in-combination assessment has now been completed and is presented in Chapters 12 and 20 of the ES. The HRA concludes (paragraph 4.4.11) that the peak change in AADT remains below the screening threshold. Subject to the securing of measures set out in the oCoCP (paragraphs 5.2.4, 5.2.5, 5.3.2), we agree that it is likely there would be no adverse effect on the integrity of Oxford Meadows SAC. Your authority, as competent authority under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), should undertake an Appropriate Assessment of the proposal, in accordance with Regulation 63 of the Regulations. We would be	Internationally Designated Sites Noted. Cothill Fen Special Area of Conservation (SAC) Noted. Oxford Meadows SAC Noted. Nationally Designated Sites The assessment of SSSI's within Chapter 9 of the ES [APP-046] will be updated as per the request.

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		pleased to review the detailed mitigation measures within the oCoCP as it is developed. Natural England is satisfied that 'green' issues are unlikely to result in adverse effects on the integrity of internationally designated sites, subject to delivery of the project in line with the presented design and evidence. Nationally Designated Sites Environmental Statement Chapter 9 (November 2024) [APP-046] contains an assessment of impacts to ecology and biodiversity, including on Nationally designated sites. There are a large number of Sites of Special Scientific Interest within close proximity of the development proposal. These sites are presented in Table 9.6.2 in Chapter 9 of the ES. We note that this table has a column labelled 'relevant qualifying interest' when in fact this column shows the designation classification. Our previous Section 42 Consultation Response highlighted the need for a full assessment of impacts to SSSIs, showing which sites had been considered, their interest features, potential impact pathways and any mitigation measures. For most of the SSSIs listed, the qualifying interest features are not fully identified or set out. The assessment is not presented in a way which examines each individual SSSI, but it does consider the relevant pathways of impact to the SSSIs. A summary table or additional column to Table 9.6.2 which showed the results of the assessment for particular sites would be helpful. Natural England agree with the conclusions of the assessment of impacts to SSSIs.	
RR-0761-002	Protected bat species.	Areas of the proposal are particularly important for Bechstein's and Barbastelle bats which are a protected	Each point addressed below.

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
		species under the Habitats and Species Regulations, 2017 (as amended). The ES largely recognises the importance and sensitivity of these species, and impacts through 'habitat severance' are considered in paragraph 9.9.774 but this is not very detailed. In particular there appears to be a reliance on a precautionary assessment that the habitat is valuable, but will not be impacted due to embedded mitigation measures. However, there is a dearth of specific information on the delivery, management and monitoring of these mitigation measures. Whilst the overarching objective to increase biodiversity of the site and bring much more of the site into a nature conservation-led management plan is welcomed, and should improve the value of the site for wildlife, there are some points of clarification required regarding the existing ecological value of the site, especially in terms of its value for bats and the effectiveness of proposed mitigation.	
RR-0761-003	Bat Survey Approach.	We understand that the approach taken has been to sample some key landscape features in order to gain an understanding of the general level of bat activity and likely assemblage present. The number of sampling points (static detector locations) and the survey methods used (no in-field static detector locations/paired sampling, no onsite transects, and only limited information obtained from the radio tracked bats) have not allowed for a thorough understanding of how bats currently use the site, or a robust baseline. The bat surveys have not been comprehensive enough to identify key flight lines, key foraging areas, or identify hedgerow tree and woodland edge roosts to inform the design sufficiently to avoid the risk of affecting bats' use of these important areas. Although radio tracking was undertaken this was only used to locate roosts, with no regular over-night tracking of locations and activity to	While the Applicant considers that its assessment of the baseline remains robust and the sites surveyed were appropriate to assess effects in the ES Chapter, further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to during Examination, as a separate bat technical note as soon as analysis is complete, likely in July. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025.

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		provide data on how those tagged bats are moving through and utilising the landscape. Of the data that has been obtained, although brief descriptions of static detector locations have been provided (Bat Survey Report [APP-153] Tables 2.1 and 2.2), Figures 2.1 and 2.2 are of such low resolution over a large scale that it is not possible to see the exact location of the sampling points and the habitat areas, linkages or corridors that were surveyed. None of the data obtained from undertaking woodland transects and statics appear to have been reported, and the Preliminary Bat Roost Assessment (as referenced in para 9.4.27 of Chapter 9 of the Environmental Statement) has not been submitted to the document library. The trapping and radio tracking data is only briefly described with no data available on which bats were trapped where and when, presence of juveniles, where each individual bat was radio tracked from and to, or the timing/synchronicity of roost emergence counts. All of this vital additional data would help to give context on how important the area is for bats and gain better understanding of the bats that utilise the site. For example, the unusually high numbers of 'big' bats trapped in woodland locations (30 noctule, 2 serotine and 3 Leisler's) may give important insight into their presence locally, or high numbers of Natterer's, if trapped in one location in autumn, could suggest swarming, but such generalised data does not allow for anything but generalised interpretation. No detailed information on methods for roost characterisation or emergence counts has been provided and it is not clear whether counts were made consecutively or simultaneously and no inference on aspects such as roost switching or fidelity can be made. Likewise, identification of maternity roosts from post-lactating	It is intended that these data, combined with that submitted with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to inform whether any refinements to the conservative assumptions that underpin the extent of the 'appropriate buffers' for bats recommended in the ES that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20) are appropriate. Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going. Updated Figures 2.1 and 2.2 ES Appendix 9.4 Bat Survey Report [APP-153] at a higher resolution to be provided in the bat technical note. Full data with respect to the radio tracking to be provided in updated bat technical note in July. Such data have been presented to Natural England in a summarised form during on-going engagement post

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		females outside of the maternity period may also be misleading. Hundreds of bats were trapped and those fitted with radio transmitters were ringed, however no further mention of encountering or not encountering ringed bats is made. Given how extensively the bats in the wider area are studied (e.g. August et al 20142, and Wytham Bat Project), it is interesting that no ringed bats were encountered during the trapping conducted, or this may be an omission in reporting. Natural England welcomes the conclusion that the mosaic of habitats within the Zone of Influence is considered to be of 'at least national importance' to bats. However, species-poor fields, and open habitats should not automatically be considered of low habitat value to bats, especially as no in-field bat survey data has been obtained for any of the habitats present. It has not been reported whether the presence of field margins currently managed for nature conservation, areas of higher plant species diversity such as expanses of ruderals or hay-cut grassland, or existing damp/ephemerally wet areas have been surveyed for or related to bat foraging activity. Water (Entwistle et al., 2014) especially can increase insect numbers, hence benefit foraging bats. It is also worth considering the species assemblage known to be present within the site (barbastelle, Leisler's, Nathusius' pipistrelle, noctule, serotine, common pipistrelle, soprano pipistrelle, brown long-eared, and Myotis spp.), all of which are known to forage (at least occasionally) in open space, and all UK bat species are capable of commuting across open space when fully dark.	submission and are the subject of on-going discussions between the Applicant and Natural England. Background data from the Wytham Bat Project has been obtained and will be described in the bat technical note. Bats ringed through that project were encountered within trapping in Wytham and in the Southern Site Area during the trapping completed in 2024. No other location across the Project caught bats ringed in Wytham

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			The Project incorporates significant new, high-quality bat foraging habitat in the form of the River Evenlode Corridor, woodland, enhanced hedgerows and associated buffers. Areas where existing field margins occur will be incorporated into the buffers to be created along hedgerows. Further static monitoring data collected in 2024 will be submitted within the bat technical note. This includes data from in-field monitoring points to illustrate their use or otherwise by the existing bat population. These data will be used to help inform the overall area of buffers required for bats and associated foraging resource. The full data set will then be linked to existing and proposed habitat resource
RR-0761-004	Project Design.	The bat survey data that has been obtained does not appear to have informed the design in any specific locations, except the retention and enhancement of the River Evenlode corridor. Yet, significant habitat creation and enhancement linking this potentially important riparian area with other areas of potential (and confirmed) importance such as woodlands, smaller copses and other riparian habitats, as well as known roosts, is not explicit in the design. It is also noted that static detector surveys indicated that another survey location (S7) supported a similar average level of bat activity as this riparian feature in 2023, which is not reflected in project design. Where hedgerows are to be 'reinforced' or larger buffers proposed (wider than the proposed 5m standard), this appears to be largely along public rights of way, access routes or some boundaries of the overall development area; these non-developed areas with larger buffers and greater habitat provision have not been specifically located along existing features or routes utilised by bats, or to connect with or buffer known roosts and potential areas of supporting habitat.	The masterplan is illustrative and there is an existing commitment to incorporate appropriate buffers to all important bat flightlines (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). This is likely to include corridors linking the Evenlode corridor to other areas of existing habitat. The bat technical note will draw together the habitat data with the survey data to demonstrate how bats will be accommodated within the masterplan. The location of any larger buffers, should they be considered appropriate, will be determined following the additional bat survey work being completed, in consultation with Interested Parties.

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		Paragraph 8.5.1 of the Outline Landscape and Ecology Management Plan (oLEMP) [APP-235] states that ‘The Project will incorporate appropriate buffers either side of any important bat flight line, as identified by radio tracking studies of the Project Site. Such buffers will not include any solar infrastructure and are to ensure that bats can use the landscape unhindered by any interaction between their echo location and solar panels’. However, the radio tracking data and bat survey effort does not appear to have identified any important flight lines. If it is to be assumed that all existing landscape and habitat features including hedgerows, tree lines, watercourses and conservation field margins are used by the important bat assemblage present on the site, then provision of wider buffers along these features should be standard for the scheme. A 5m buffer is a minimum practical width to allow access for machinery to manage hedgerows and margins. Therefore, to be considered sufficient to mitigate potential impacts on bats, and provide benefits in terms of habitat retention and creation, it is recommended that these are enlarged to at least 10m either side of every hedgerow and along all non ancient woodland edges, increased to 20m either side, or swathes and areas omitted from having PV panels altogether, where a significant habitat linkage is identified, or required to provide supporting habitat surrounding important roosts. This recent research is referenced in paragraph 9.9.774 of the Environmental Statement [APP-046], which states “The impact of solar farm sites on bats has been the subject of recent research (Tinsley et al. 2023; Szabadi et al. 2023). This research suggests that there is a potential effect of solar panels on the ability of bats to forage through solar farms, with potential interactions between echolocation and solar panels. Such an effect	The location and size of the appropriate buffers will be determined following the additional bat survey work being completed, in consultation with Interested Parties.

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		could lead to bats avoiding fields with panels with associated severance impacts, preventing bats from commuting between roosts and foraging habitat. In order to ensure that such an effect does not occur, the Project will incorporate appropriate buffers along all important commuting habitat used by bats. The incorporation of such buffers will limit any severance impact, ensuring that bat species are still able to forage and commute across the Project site, post development. After the application of this mitigation, the magnitude of impact is therefore, considered to be negligible.' There is, however, insufficient bat survey data to identify all important commuting habitat used by bats. If the ES is referring to all hedgerows, then the 5m buffer is not considered adequate to be sure of preventing avoidance and severance impacts for bats. Should there be even a minor adverse significance of effect, as suggested by the ES, given the vast scale of the development, such altered behaviour could have a detrimental effect on the Annex II bat populations if bats no longer utilise the landscape in the same way for roosting, commuting or foraging. Providing wider buffers as standard along all hedgerows, as well as omitting key linkages and supporting habitat from installation of PV panels, and/or creating much wider habitat linkages would help to ensure that, should bats have an aversion to the areas of PV panels, there is sufficient space and habitat to allow the ecological functionality of the landscape to remain.	

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			While the Applicant considers that its assessment of the baseline remains robust and the sites surveyed were appropriate to assess effects in the ES Chapter, further survey work and data gathering was completed in 2024 is the subject of on-going discussion with Natural England. Data will be provided during Examination as a separate bat technical note as soon as analysis is complete. This includes: • additional static detector recording (including in-field); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); • full details of trapping/radio tracking to be completed in May 2025 During post submission discussions between the Applicant and Natural England, it was agreed that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report [APP-153]) will be used to determine the extent of the

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			'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule [APP-129] Commitment 9.20). Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.
RR-0761-005	Lack of Robust Baseline and Construction/Operation Monitoring	As per the Environmental Statement: Chapter 9 [APP-046] and Outline Landscape and Ecology Monitoring Plan (oLEMP) [APP-235], monitoring is not proposed for bats post-development (unless specifically required under licensing for impacts to roosting bats; oLEMP para 16.5.15). Without conducting any monitoring and comparing this with a pre-development baseline it will not be possible to assess whether the development of the site has had an effect on bats, whether that is positive or negative, and highlight the need to address any negative impacts or changes to the management regime. The current level of survey data provides only a minimal baseline for the site, with data for a few localised areas. It would be beneficial to have a more thorough and robust baseline against which to measure change in bat activity or assemblage. A change in how bats utilise the site would not be possible to assess given the current minimal baseline. At the very least, we recommend that there should be a commitment to monitor for changes in bat activity at these limited locations during construction and post-development and incorporate any necessary changes into the LEMP for the site to ensure that the important bat assemblage is not adversely affected by the installation of the PV panels and the operation of the solar farm.	A post-development monitoring regime has been discussed between the Applicant and Natural England during post-submission discussion. A final version of the proposed post-development monitoring regime will be set out in the bat technical note.
RR-0761-006	Lack of Clarity	There are also points of clarity required over the existing value of the site's habitats for bats. Currently the various submission documents provide differing or	While the Applicant considers that its assessment of the baseline remains robust and the sites surveyed were appropriate to assess effects in the ES Chapter, it was

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		contrasting impressions. Paragraph 7.1.4 of the oLEMP [APP-235] states that the River Evenlode corridor 'comprises almost exclusively further intensively managed arable fields within the active floodplain of the river'. Whereas the Phase 1 habitat survey report indicates that there are many existing grassland habitats along the river, particularly fields 2.31, 2.32, 2.33 and 2.34 in Area 7, 2.35, 2.36, 2.67 and 2.68 in Area 9, field 2.72 in Area 11 and fields 2.93 and 2.94 in Area 13. Furthermore, during a site visit it was observed that some of these fields appeared to be grazing marsh. Although these fields are being retained and management measures brought in via the LEMP to benefit wildlife, there may not be such a significant beneficial change in terms of availability and quality of bat foraging as suggested in the ES and oLEMP. The same is true of the field margins and hedgerow buffers, as although the landscape where the PV panels are proposed is largely under arable cultivation, many of the fields have environmental enhancement measures already present in the form of bee banks and conservation headland habitat provision, much of which is already 5m in width. For example, the existing habitats are described in Chapter 9 of the ES (paragraphs 9.6.11 to 9.6.20) as: Area 1 and 2; "fields are bordered by grassland of varying sward height, up to 6m wide planted as bee borders". Area 3 and 4; "fields are arable and contain broad margins and strips of uncultivated vegetation", "On the western and southern fringes of Area 3 are 5m wide strips of tall uncut grassland. A tall uncut grass fringe up to 5m wide on the north and east side of eastern field of Area 3". "The fields in both Area 7 and 8 east of the Bladon to Cassington Road are pasture, mostly cut for hay but with some sheep grazing in Area 7". Also, Paragraph 9.6.47 states "The areas of high invertebrate interest are patchily distributed but the	agreed during post-submission discussion between the Applicant and Natural England that the Applicant will provide further detail of the Project site's baseline value for bats within the bat technical note to help Natural England and other IPs to understand the baseline value and hence uplift in that value from the Project.

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		hedgerows and field margins in many places have good connectivity and are well managed for wildlife diversity. The presence of marshy habitats by rivers add to the invertebrate potential of some areas", which suggests that existing areas of higher potential prey abundance have been overlooked when considering the value of the site for bats, including the open habitats and influence of existing hydrology."	
RR-0761-007	Important bat flightline buffers.	It is not clear how many of the proposed hedgerow buffers (proposed as embedded mitigation for impacts to bats), are encompassing existing habitat managed for nature conservation purposes. These margins will already be providing connectivity and foraging resources for bats, and retention although welcomed, is not providing a benefit that would serve to offset any losses of habitat or connectivity.	Details of bat flightline buffers, including interactions with existing margins, where they occur, will be detailed in the bat technical note.
RR-0761-009	Habitat provision and enhancement.	In terms of habitat provision post-development, there is some discrepancy over what is presented in the oLEMP and what is shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan (LEAP) [APP-228]. On the LEAP it is stated that "Proposed Landscape areas are indicative", and therefore it is not clear how much this plan would change once a DCO had been granted, and whether this is too indicative to be usefully reviewed in the consultation. It currently shows very little woodland planting (a few isolated blocks on plans for Central Site Area 2, 3, and 4 – which is named Zone 2 Evenlode Corridor and Zone 3 Valley Farmland in the oLEMP), and does not reflect all of the measures outlined in the oLEMP, especially concerning woodland creation. For example, the oLEMP refers to "Native species woodland planting to define Project boundaries, provide buffers to existing development and transport corridors, link existing areas of woodland and other habitats and provide visual screening to the Project and help to break up the overall mass of the Project" for the majority of areas of the site including; Zone 1 Northern	The LEAP and Illustrative Masterplan are both intended to be illustrative. However, the final landscape design will follow the principles set out in the oLEMP and, as such, where any apparent discrepancy occurs, the final designs will follow what is set out in the oLEMP.

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		Estate Farmland, Zone 2 Evenlode Corridor, Zone 3 Valley Farmland and Zone 4 Wooded Estate Farmland, however this is not reflected in the LEALP or Illustrative Masterplan, and therefore it is difficult to visualise how those measures would be achieved on the site. The ES also states that the 'Project has been designed to enhance hedgerow links between blocks of ancient woodland' (table 9.3.1) and it is not clear where these enhanced linkages will be. There is a lack of clarity over what 'reinforced' hedgerows will actually comprise. It is mentioned in paragraph 7.2.5 of the oLEMP that circa 30km of existing hedgerows will be reinforced with additional planting, and 8.2.2 that at least 26km of existing hedgerows are to be reinforced through additional planting, but it is not made clear whether this is along the entire length to create a double hedge, or just in-fill in any gaps, or how exactly this will strengthen existing corridors. Paragraph 11.3.9 states that gappy and species-poor hedgerows will be supplemented by species in-fill planting, so it is not clear whether this comes under the 26km – 30km of the reinforced ones or is an additional measure that is not currently shown on the LEAP.	Reinforced hedgerows will include gappy and species-poor hedgerows to be supplemented by species infill planting. A mixture of native species will be used comprise additional planting [APP-235].
RR-0761-010	Hydrological regime changes.	Table 9.4.2 of Chapter 9 of the ES states that there will be no changes in the hydrological regimes experienced by ecological receptors during construction or operation. However, should creation of floodplain meadow along the length of the River Evenlode be possible, as suggested by the oLEMP, it will be essential to understand whether and how the river has become disconnected from its floodplain and rectify any drying of the land adjacent to allow this habitat to develop as proposed. A change in management is unlikely to have the desired effect if the land no longer floods and the arable habitats or improved grasslands	The River Evenlode corridor floods extensively on a seasonal basis. However, the majority of fields that would comprise the new habitat creation are farmed as arable land and, as such, do not comprise any form of wet grassland habitat. Notwithstanding this, the value of the Evenlode corridor to bats will be further detailed in the bat technical note.

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		have become disconnected from the river via land drains, level changes or any other previous change to the hydrological functionality of the area. If the land already floods, then this existing habitat, even if seasonal or ephemeral, should be better reflected in the assessment of the existing ecology of the landscape and how this supports wildlife, including the important assemblage of bats present within the site.	
RR-0761-011	Bat survey report errors.	There are a few errors in the Bat Survey Report that contribute to a lack of clarity and hinder full interpretation of the report. For example, paragraph 4.1.7 states that "Overall activity at locations S1 and S3 were at similar levels. However, in 2023 S8 was re-deployed at this location and recorded the highest level of bat activity across all the sites in 2023". This paragraph is not only confusing, but contradicts Figures 2.1 and 2.2 which do not show S8 in the same location as S1 or S3. Likewise, data presented within Table 3.26 does not indicate that S8 recorded the highest level of bat activity across all sites in 2023.	The bat technical note will address any clarifications required in previous reporting and interpretation of the data.
RR-0761-012	Recommendations.	1. Either additional bat surveys conducted (some of which should be paired field interior and field boundary surveys) to identify areas of specific importance for bats or much more extensive buffering of all hedgerows, riparian habitats, woodland, damp/wetland areas and trees, and removal of some proposed areas of PV panel installation where these areas either link known roosts to wider habitat areas or may be providing supporting foraging habitat. 2. Provide more thorough interpretation of the data obtained from trapping and radio tracking. Interpretation based on detail in the data, such as exactly which bats were trapped in which location, where each individual radio tracked bat was trapped and where it was tracked to, any flight lines or foraging activity recorded during tracking. How roost counts were conducted (dates, duration, weather conditions,	With the exception of point 6, all other points to be addressed within the bat technical note. With respect to hydrology, the River Evenlode corridor floods extensively on a seasonal basis. However, the majority of fields that would comprise the new habitat creation are farmed as arable land and, as such, do not comprise any form of wet grassland habitat.

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		equipment used). Whether any ringed bats were encountered or re-encountered. 3. Present interpretation of the bat activity data recorded during the woodland transects and woodland static detector surveys. This would also help build up a picture of bat activity within the zone of influence. 4. Use existing trapping and radio tracking data to investigate how bats currently utilise the site, if these data are available. Or provide rationale for not using radio tracked bats in this way. 5. Provide more detailed plans showing the locations of the static detectors, and clarity over errors in the Bat Survey Report to help better understand this activity data. 6. Provide greater detail of the existing hydrology of the site, including the River Evenlode corridor and how its floodplain currently functions, or reasons why it does not and how this can be rectified. 7. Provide a plan showing the existing areas managed through livestock grazing, hydrology (presence of any damp/wet areas), and conservation field margin measures in arable fields. I.e. existing management measures that may increase prey availability, and where possible relate this to bat survey data and mitigation proposals. 8. Clarify the definitions of 'reinforced hedgerows' and provide more detail on their location as well as the locations of hedgerow enhancement and woodland linkage. 9. Include a commitment to monitoring bat activity during construction and operation and relate this to	

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		(ideally a more robust) baseline to identify and address any negative impacts associated with the development and guide LEMP updates or revisions. 10. During pre-application discussions, we advised that a specific document was produced to consolidate information on the impacts to the bat populations, the collected survey data, key flight lines and important habitats, and the specific mitigation measures. We would still recommend that a standalone document would be useful to bring together elements from the ES, Bat Survey Report, Masterplan, LEAP and oLEMP.	
RR-0761-013	Dormouse	Given the presence of Dormouse within the network of hedgerows within the site, any hedgerows removals will be subject to licensing requirements. We note that there is no reference to potential impacts to this species whilst hibernating. Dormice hibernate in nests on the ground and are therefore very susceptible to harm during winter habitat management works, particularly machinery tracking over them. There is a high likelihood that they will be present within the rough grassland margins buffering the hedgerows. There is no consideration of reducing this risk outlined in the oLEMP, just that hedgerows will be cut in the winter when dormice are not active: oLEMP paragraph 8.6.1 'Hedgerow and woodland management will take place during winter when dormice are not active (i.e. from November until February). This will also help avoid impacts to nesting birds.' oLEMP Appendix C Typical Maintenance schedule: "Trimming should take place during late winter to maximise food and cover availability for wildlife and also to avoid detrimental effects on breeding birds." oLEMP paragraph 11.3.5 states: 'hedgerows to be cut in late autumn'.	The oLEMP will be updated in the next iteration to reflect the request with respect to providing additional protection for hibernating dormice.

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		Wider buffers between the fencing and the hedgerows would allow for a long-reach tractor-mounted flail to be used to avoid tracking over longer grassland, where it would be much harder to spot and avoid dormouse hibernation nests. If tracking over rough grassland habitat won't be avoidable during autumn/winter hedgerow management then all areas that will have machinery tracking over should be first checked by hand by an experienced dormouse ecologist for the presence of hibernation nests and any nests left in situ and avoided.	
RR-0761-014	Letter of No Impediment (LoNI) for protected Species Licences	At this stage, Natural England have not been engaged regarding the production of a Letter of No Impediment (LoNI) for protected Species Licences; should this be required, submission of draft protected species licence applications would be required for review. Information relating to wildlife licencing and NSIPs is provided within the Planning Inspectorate's Advice Note 11, Annex C – Natural England and the Planning Inspectorate.	The Applicant and Natural England are in discussion with respect to the provision of LONIs. It is anticipated that those for badger, dormice and GCN will be necessary. The issue of whether a licence is necessary for bats is under discussion, but the Applicant remains confident that, should a licence be required for bats, there are no barriers to such a licence being capable of being secured for the Project (a matter that the Applicant and Natural England are in discussions about).
RR-0761-015	Biodiversity Net Gain.	We welcome the ambitious plans for nature restoration across the project site, especially along the River Evenlode Corridor and the calculated 80% and 58% net gains in habitat units and hedgerow units respectively. We have provided comments above in section which relate to a lack of clarity regarding the proposed habitat creation. We also note that Paragraph 9.1.6 of the oLEMP states that 'No net gain is targeted for watercourses on the basis that none are being impacted by the Project'. Guidance on assessment of impacts within the Riparian Zone can be found in the Statutory Biodiversity Metric User Guide. A Watercourse Biodiversity Metric calculation should be completed for any changes taking place within 10m of a watercourse, whether that be	The Applicant is currently completing the necessary surveys to allow the river component to be completed. Once completed, this will be provided to the Examination as part of an updated version of ES - Appendix 9.13 Biodiversity Net Gain Assessment [APP-162].

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		development or habitat changes. Therefore, it is likely that this assessment is needed, especially if the minor watercourses are not being buffered by more than 5m, and it is stated that the River Evenlode is being reconnected with its floodplain to create floodplain meadow habitat along its length on the site.	
RR-0761-018	Ancient Woodland and Ancient/Veteran Trees.	Natural England advise that impacts on ancient woodland and ancient and veteran trees should be considered in line with paragraph 180 of the NPPF. Natural England and the Forestry Commission have also produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. We note that there is no Ancient Woodland or ancient/veteran trees within the order limits or within close proximity; as such, have no detailed comments to make.	There are no blocks of ancient woodland within the Project site although some are present adjacent to the order limits and in the surrounding landscape. Ancient and veteran trees do occur within the order limits and ancient woodland immediately adjacent, but there are sufficient RPAs/buffer zones are to be maintained to avoid adverse impacts.
2. Landscape and Visual Impacts			
RR-0761-016	Landscape Character	The proposed development is not located within, or within the setting of, any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of this development. The examining authority should have regard for the landscape character of the area; we welcome the reference to Natural England's National Character Areas and other Local Landscape Character Assessments within ES Chapter 8 (Landscape and Visual Impact Assessment). We would also like to stress the importance of cumulative landscape impacts from the development.	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [APP_6.3]. The Landscape and Visual Impact Assessment [APP-045], includes and assessment of cumulative effects at section 8.11.
3. Agricultural Land Use			
RR-0761-017	Natural England	Soils and Best and Most Versatile Agricultural Land - Natural England apologise that we are not able to provide our relevant representations on this topic due to an internal error. We will endeavour to update this position as soon as we are able.	Noted.

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4. Public Right of Way			
RR-0761-019	Natural England	Rights of Way, Access Land, National Trails - There are no National Trails, Open Access Land or Coast paths within the order limits; as such, no impacts to these features are likely. We recognise the oLEMP's commitment to provide and maintain new permissive walking routes as well as the consideration of impacts to open space, leisure and play in Chapter 16 of the ES [APP-053]. We look forward to further working with the applicant to input into access provision, connecting people with nature, and designing access provision to minimise impacts to biodiversity.	Noted.
5. Legal			
RR-0761	Permissive Paths	Natural England note that the draft DCO does not contain any requirements relating to the creation and maintenance of permissive paths, nor any specific measures relating to the closure of Public Rights of Way. Although these are considered elsewhere through the DCO, we understand that requirements relating to access are not uncommon and would encourage a consideration of their addition to the draft DCO.	Specific measures relating to the closure of PRow, both temporary and permanent, are secured through Requirements 11 and 12 of the Draft DCO [AS-009]. Creation and maintenance of permissive paths are secured through the Landscape and Ecology Management Plan under Requirement 6 of the Draft DCO. The Outline LEMP [APP-235] provides the framework through which permissive paths will be provided for and maintained, with locations of permissive paths identified in the Landscape, Ecology and Amenities Plan [APP-228].



Botley West Solar Farm

Applicant Responses to Relevant Representations - RAF
Brize Norton [RR-0867]

June 2025

PINS Ref: EN010147
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I. Applicants' Comments in response to Relevant Representations submitted by RAF Brize Norton [RR-0867]

Table I-1: Applicants' Comments on Relevant Representations

RR Ref No	IP Name	Comments from Relevant Representations	Response to Relevant Representation
1. Glint and Glare			
RR-867	Impact on Aviation and Airfields	Under UK Military Aviation Regulations, as Aerodrome Operator, I am charged with providing a Safe Operating Environment at both RAF Brize Norton and RAF Weston on the Green. Due to the location, I have interests (and possible concerns) about the site location, orientation and its effect on the safe operation of aircraft. Whilst not exhaustive, the concerns primarily extended to; "glint and glare", changes in wildlife patterns, and interactions with Primary Surveillance Radar equipment.	Glint and glare assessments for aviation receptors are typically undertaken for licensed aerodromes within 10km of a proposed solar development. Geometric modelling for General Aviation aerodromes is typically required within 5km of a proposed development. RAF Brize Norton is located approximately 14km from the closest panel area and has therefore been considered at a high-level within the glint and glare study. Any solar reflections towards pilots approaching runway threshold 25 will be outside a pilot's primary field-of-view. This level of glare is acceptable in accordance with the associated guidance and industry best practice. It is also predicted that any solar reflections towards pilots approaching runway threshold 07 would have intensities no greater than 'low potential for temporary after-image'. Based upon site size, distance, and previous project experience, this level of glare is acceptable in accordance with the associated guidance and industry best practice. It can be reliably predicted that personnel within the ATC tower will not experience solar reflections. This is based upon ATC Tower height, the distance to the proposed development, and previous project experience. Due to the low-lying nature of the panels, the significant separation distance and intervening terrain, it is not predicted that these will have any technical impact upon the radar more than any other similarly sized object at this distance, nor would they be tall enough to affect the radar coverage for the radar at RAF Brize Norton.



Botley West Solar Farm

Applicant Responses to Relevant Representations -
Southern Gas Networks plc [RR-0981]

June 2025

PINS Ref: EN010147
Document Ref: EN010147/APP/11.4

I. Applicants' Comments in response to the Relevant Representation submitted by Southern Gas Networks plc [RR-0981]

Table I-1: Applicants' Comments on Relevant Representations

Comments from Relevant Representations	Response to Relevant Representation
Southern Gas Networks plc (SGN) is a licensed gas transport under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in Scotland and the South of England. SGN's gas networks distribute natural and green gas to 5.9 million homes and businesses, and SGN is a statutory undertaker for the purposes of the Planning Act 2008. SGN is making a relevant representation in respect of the application for the Botley West Solar Farm (the Project) in order to protect its position because of its infrastructure and land interests with are located within or near to the order limits and which form part of it. SGN's rights to retain its apparatus located within or near to the order limits should always be maintained and access to inspect such apparatus must not be restricted. SGN's primary concern is to meet its statutory obligations and ensure that the Project does not impact in any adverse way upon its gas distribution network or those statutory obligations. As such, SGN requires adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are protected and to include compliance with relevant safety standards. SGN provided Photovoltaic Development Partners (PVDP) on behalf of SolarFive Ltd (the Promoter) with its standard form protective provisions on 27 June 2024 but these were not included in the draft development consent order (DCO) submitted with the application for the Project. The draft DCO does not currently contain a form of protective provisions for the protection of SGN's apparatus and land interests that are to SGN's satisfaction. SGN has however exchanged comments with the Promoter's solicitors on its expected form of protective provisions, and is awaiting comments on the most recent turn of the document. Unless the draft DCO is updated to include SGN's form of protective provisions then SGN will submit its required form of protective provisions at the start of the examination. This is a fundamental matter of health and safety. At this stage, SGN is not satisfied that the tests under section 127 of the Planning Act 2008 can be met. SGN will continue to work with the Promoter to reach satisfactory agreement with it. SGN would hope that its protective provisions will be agreed before the preliminary meeting. SGN reserves the right to make further representations as part of the examination process and to attend any relevant hearings.	No response required. The Applicant recognises the need for SGN to ensure that its apparatus and land interests are protected and to include compliance with relevant safety standards. On that basis, the Applicant has included draft protective provisions at Part 6 of Schedule 15 in the draft DCO [AS-009] for the protection of Southern Gas Networks Plc as gas undertaker. The Applicant is eager to continue engage with SGN to agree the form of protective provisions. The Applicant most recently circulated the latest draft of the protective provisions to SGN on 19 May 2025 and is awaiting a response. The Applicant has also issued the latest draft of a corresponding side agreement, as required, on 23 May 2025. Once the protective provisions are agreed, the Applicant will update the provisions in Part 6 of Schedule 15 of the draft DCO to reflect the agreed position.



Botley West Solar Farm

Applicant Responses to Relevant Representations -
Thames Water [RR-1045]

June 2025

PINS Ref: EN010147
Document Ref: EN010147/APP/11.4

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5. DCO Drafting 5

I. Applicants' Comments in response to the Relevant Representation submitted by Thames Water [RR-1045]

Table I 1: Applicants' Comments on Relevant Representations

Matter Summary	Comments from Relevant Representations	Response to Relevant Representation
1. Hydrology and Flood risk		
Infrastructure drainage strategy	TWUL requires a thorough review of the Applicant's outline infrastructure drainage strategy, particularly where connections to TWUL's foul or surface water networks are proposed. If the Applicant intends to discharge into these systems, a pre-development inquiry must confirm network capacity. This assessment is crucial for identifying necessary upgrades and ensuring their timely delivery before the development connects. Without it, there is a risk of overloading existing infrastructure, leading to service failures or unplanned upgrades that could delay the development.	No connection is proposed to Thames Water assets. Additionally, as stated in 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 [APP-232 and APP-233] , pre-commencement surveys will be undertaken before construction on site to identify any local drainage assets and infrastructure. A Detailed CoCP will be provided as committed within the Outline CoCP and secured under Requirement 11 of Schedule 2 of the draft DCO [AS-009] . The CoCP will detail the requirements of pre-commencement surveys and best practice construction techniques to prevent damage to water supply and wastewater drainage infrastructure.
2. Cable Routes		
Asset Protection	Asset Protection: TWUL's clean water mains and sewers are within the Proposed Scheme's Order limits. Clashes with the Applicant's proposed underground electricity 3 export cables have been identified in multiple locations. TWUL requires the Applicant's full compliance with our TWUL's "Guidance For Working Near Our Assets" document including but not limited to: Prohibiting driven piles within 15 meters of public sewers; Requiring build-over agreements for any habitable buildings within 3 meters of the external face of public sewers; and Prohibiting development within 5 meters of water transmission mains or 3 meters of water distribution mains. Furthermore, TWUL seeks clarification as to whether the Applicant would be	The Applicant appreciates the request for bespoke protective provisions to ensure the protection of Thames Water's assets. The latest draft form of protective provisions were issued to Thames Water for review on 4 April 2025 and the Applicant is awaiting a response. The Applicant is aware that Thames Water's lawyers have requested an uplifted undertaking before their review can continue. The Applicant's lawyers are awaiting funds before being in a position to provide that uplifted undertaking. Once the uplifted undertaking is in place, the Applicant is hopeful that the negotiations can progress efficiently and agreement can be met. In the meantime, the Applicant has included protective provisions for the benefit of Thames Water at Part 5 of Schedule 15 of the draft DCO [AS-009]. Those protective provisions can be updated once the parties have reached an agreed position.

Matter Summary	Comments from Relevant Representations	Response to Relevant Representation
	considered a utility undertaker under the National Joint Utilities Guidelines (NJUG). This is essential to determine the extent to which the Applicant's cables and other infrastructure would be subject to the principles and requirements of NJUG. This understanding is critical to evaluating how the Applicant's assets will interact with TWUL's assets during the construction, operation, and maintenance of the Proposed Scheme. As set out in paragraph 5 below, TWUL is seeking to agree suitable Protective Provisions with the Applicant to ensure its assets and undertaking is protected. Until such time as these are agreed, TWUL continues to have concerns as to the potential impact of the Proposed Scheme on its undertaking.	Finally, to confirm, the Applicant is a statutory undertaker pursuant to its electricity generation licence and therefore a utility undertaker for the purposes of the National Joint Utilities Guidelines.
3. Land Agreements		
Compulsory Acquisition of Land	TWUL owns interests in land parcels identified in the Applicant's Book of Reference for compulsory acquisition or temporary possession. These interests must be protected, and any impacts adequately mitigated so as to avoid the Proposed Development preventing TWUL from being able to effectively discharge its statutory and licence obligations. TWUL is seeking to agree suitable Protective Provisions (as discussed in paragraph 5 below) however it has not yet been possible to agree mutually acceptable wording in respect of the compulsory acquisition of TWUL's interests. TWUL remains committed to working with the Applicant to agree suitable arrangements.	The Applicant welcomes Thames Water's engagement so far in relation to the protective provisions. The Applicant does not disagree to the wording proposed in respect of compulsory acquisition of TWUL's interests in principle, but can only agree to include that wording in the draft DCO once the necessary land agreements are entered into. The Applicant is eager to continue its engagement with TWUL in order to reach an agreement on the property documents and protective provisions. Heads of Terms have been issued to Thames Water for review and we understand that an agent has been instructed to negotiate the Heads of Terms. Therefore communications are ongoing between the parties and the Applicant also remains committed to working with Thames Water to agree suitable arrangements.
4. Local Ecology and Nature		
Farmoor Reservoir Sensitivity	The Proposed Scheme's construction activities near Farmoor Reservoir, a sensitive recreational and ecological site, must include bespoke method statements to mitigate noise, vibration, and other disturbances. TWUL is concerned	Ecology: The Farmoor Reservoir is a Local Wildlife Site and as such is a locally designated site. Impacts from the Botley West Solar Farm on locally

Matter Summary	Comments from Relevant Representations	Response to Relevant Representation
	about potential adverse impacts on the reservoir's operations and its environmental and community value. The reservoir embankments and associated infrastructure must be protected from excessive vibration, ground movement, and other disturbances that could compromise their stability. Additionally, the reservoir is an important habitat for wildlife and a valued recreational space for the local community. Noise, dust, and construction-related disturbances could have detrimental effects on biodiversity, including bird populations, and impact public enjoyment of the area. The Application only considers residential receptors and therefore does not assess this. TWUL is keen to engage with the Applicant but further work is required, and further design detail of the Proposed Scheme will need to be provided. A Side Agreement is likely to be required to regulate the interface of the proposed development with the reservoir.	designated sites are assessed in ES Volume 1, Chapter 9, Section 9.9 [APP-046]. Project impacts will be mitigated by a comprehensive package of embedded mitigation, as outlined in ES Volume 1, Chapter 9, Section 9.8 [APP-046]. Embedded mitigation measures will be implemented under various management plans, outline versions of these plans include the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235], Outline Code of Construction Practice (OCoCP) [APP-232-233] and Outline Decommissioning Plan (ODP) [APP-236]. Embedded mitigation will be secured in the Development Control Order (DCO) [AS-009]. Construction management: A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13: Noise and Vibration [PDB-010], with additional information provided in ES Volume 2 (Figures), and ES Volume 3 (Appendices). This assessment has identified that the development will not cause any significant adverse effects on noise sensitive receptors. This assessment includes consideration of noise from construction vehicles. During the construction and decommissioning phases, noise and vibration will be controlled and limited by the Outline Code of Construction Practice [APP-232] (CoCP). This code of practice will ensure that works in the vicinity of Farmoor Reservoir and associated infrastructure will be protected from excessive vibration, ground movement and other disturbances, that could compromise the reservoir/infrastructure. The CoCP includes construction phase noise limits, and construction times. The purpose of this Outline CoCP is to set out a written set of standards and measures that will be implemented during the construction process to ensure a consistent and effective approach to managing potential environmental impacts in order to minimise nuisances to communities and to safeguard the environment. The measures include strategies, control

Matter Summary	Comments from Relevant Representations	Response to Relevant Representation
		measures and monitoring procedures for managing the potential environmental impacts and limiting disturbance from construction activities as far as reasonably practicable. As set out at Annex A of the CoCP (the Outline Construction Traffic Management Plan (oCTMP)), paragraph 1.1.7 states that the purpose of the oCTMP is to set out how the numbers and routeing of Heavy Goods Vehicles (HGVs) will be managed during the construction phase, how the movement of construction worker traffic will be managed during the construction phase, details of measures to manage the safe passage of HGV traffic via the local highway network and details of localised road improvements if and where these may be necessary to facilitate safe use of the existing local highway network. Paragraph 1.1.8 states that a detailed CTMP will be prepared strictly in accordance with this oCTMP. This is secured through Requirement 11 of the draft DCO [AS-009]. The applicant will continue to engage with TWUL and will provide further design and scheme information as requested. A side agreement will be developed with TWUL if considered required to regulate the interface of the proposed development with the reservoir.
5. DCO Drafting		
Protective provisions	Discussions between TWUL's legal representatives and the Applicant's legal team on bespoke protective provisions remain ongoing. However, the draft Development Consent Order (dDCO) does not yet include agreed protective provisions to safeguard TWUL's assets adequately and the drafting currently provided by the Applicant remains a concern as regards the safety and operation of TWUL assets.	The Applicant appreciates the key concerns raised by Thames Water in relation to the protective provisions, namely: Acquisition of Land, Deemed Approvals, Removal of TWUL's Apparatus by the Applicant and Indemnity. These are all matters that the Applicant is discussing with Thames Water as part of the ongoing negotiations of the protective provisions. The Applicant sent the latest draft form of protective provisions to Thames Water for review on 4 April 2025 and is awaiting a response. The Applicant is aware that Thames Water's lawyers have requested an uplifted undertaking before their review can continue. The Applicant's lawyers are awaiting funds before being in a position to provide that uplifted undertaking. Once the uplifted undertaking is in place, the

Matter Summary	Comments from Relevant Representations	Response to Relevant Representation
		Applicant is hopeful that the negotiations can progress efficiently and agreement can be met. In the meantime, the Applicant has included protective provisions for the benefit of Thames Water at Part 5 of Schedule 15 of the draft DCO [AS-009]. Those protective provisions can be updated once the parties have reached an agreed position.
DCO Requirements	TWUL notes that Requirement 9 provides for the Applicant to submit written details of the surface water drainage works and (if any) foul water drainage system (including means of pollution control), for approval by the local planning authority. Given the importance of such works to its network, TWUL requests that it is made a consultee for that Requirement to ensure the drainage proposals consider asset capacity, pollution control, and compliance with connection requirements. Further, TWUL is considering whether a standalone Requirement obligating the Applicant to submit a detailed drainage strategy for TWUL's approval before any connections are made is required. Should such a Requirement be necessary, it should stipulate that no part of the development may commence until TWUL has reviewed and approved the strategy, ensuring adequate capacity assessments and mitigation measures. This is essential to protecting network efficiency, preventing unplanned impacts, and supporting sustainable drainage solutions. TWUL will continue to keep this under review as further details of the Proposed Scheme are made available and will engage with the Applicant to agree a suitable DCO Requirement as necessary.	The Applicant is willing to include Thames Water as a named consultee for the purposes of Requirement 9. The Applicant has updated the draft DCO at Deadline 1 to include Thames Water as a consultee for the purposes of that Requirement. The Applicant will await any further comment(s) from Thames Water in relation to any request for a standalone Requirement obligating the Applicant to submit a detailed drainage strategy for TWUL's approval before any connections are made. As set out above, the Applicant does not consider this to be necessary or appropriate here as no connection is proposed to Thames Water assets .



Botley West Solar Farm

Applicant Responses to Relevant Representations - The
Gardens Trust (jointly with the Oxfordshire Gardens Trust)
[RR-1051]

June 2025

PINS Ref: EN010147

Document Ref: EN010147/APP/11.4



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I. Applicants' Comments in response to the Relevant Representations submitted by The Gardens Trust (jointly with the Oxfordshire Gardens Trust) [RR-1051]

Table II-1: Applicants' Comments on Relevant Representations

Comments from Relevant Representations	Response to Relevant Representation
1. Historic Environment	
We urgently request a re-think of the wisdom of the allocation of solar here which would cause semi-permanent damage to the iconic setting of Oxford as well as the Blenheim World Heritage Site and its international significance.	The 2 km study area for the assessment of impacts and effects of the Project arising from changes within the settings of heritage assets was established through consultation with relevant stakeholders, commencing with the Scoping stage of the Environmental Impact Assessment (EIA). As set out in paragraph 1.3.1 of ES Appendix 7.5: Settings Assessment [APP-142], designated heritage assets beyond 2 km were considered if they fell within the Zone of Theoretical Visibility (ZTV) for the Project and had designed views towards the Project Site or a particular iconic status that could be affected by the Project. The city of Oxford was not identified by the Applicant as a heritage asset requiring detailed assessment, nor was it identified as such by any consultee or stakeholder during the consultation process. The Applicant does not dispute that the city is visible in views from certain parts of the Project Site. However, the historic core of the city is around 4.5 km from the nearest part of the Southern Site and around 7.5 km from the nearest part of the Central Site, and even further from any of the elevated locations within the Project Site from which the city is actually visible. In all of the views towards the city of Oxford from within the Project Site, other more recent developments are visible in front of the historic core. Depending on the location of the viewpoint, these include not just more recent residential areas but also major highways on raised embankments, the city airport, and major developments such as the Oxford Science Park. The addition of solar panels and hedgerow planting in the foreground of any view from within the Project Site towards the city of Oxford is unlikely to have any impact on the heritage significance of the city of Oxford. The Project has been carefully designed to ensure that no part of the development would be visible in any of the defined key views out of the Blenheim Palace World Heritage Site (WHS), or indeed from any location within the WHS. The Applicant's assessment of likely impacts and effects of the Project in respect of the Blenheim Palace WHS is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This

Comments from Relevant Representations	Response to Relevant Representation
	assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England. The Heritage Impact Assessment identified a likely ‘minor negative’ impact on one defined attribute (Attribute 7) which contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. This is Attribute 7, which states <i>‘The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it’</i>. The overall assessment of likely impacts and effects on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as ‘negligible adverse’, based on the ‘minor negative’ impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4, [APP-141]). The impact would be long-term (time-limited) and fully reversible. The sensitivity/value of the WHS is determined as ‘very high’, resulting in a likely effect of ‘minor adverse’ significance, which is not significant in EIA terms. The Applicant notes that in their Relevant Representation (RR-0398), Historic England does not disagree with the Applicant’s assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4, [APP-141]), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment [CR1-003]. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS. The Applicant also notes that in their Relevant Representation [RR-0413], ICOMOS-UK state that <i>‘the proposed Botley West solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map ‘Character of Setting of WHS’ on page 50 of Appendix III of the Management Plan’</i>. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the Outstanding

Comments from Relevant Representations	Response to Relevant Representation
	Universal Value (OUV) of the UK World Heritage Sites and their settings is one of their key objectives. Characterisation of impacts as “semi-permanent” is incorrect. It is widely accepted from recent Secretary of State Solar DCO decisions that Solar DCOs are temporary activities, including Solar DCOs of longer duration than the Project. EN-3 also recognises that a 40 year durations is “typical” for a Solar DCO.
The proposals also impact on the setting of numerous listed buildings and their settings and non-designated landscapes such as those at Hordley and Lower Dornford Farmhouse, the latter a Capability Brown designed landscape.	The detailed assessment of residual impacts of the Project on designated heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment [APP-142]. For each of the heritage assets selected for detailed assessment, their heritage values were identified along with an assessment of the contribution that their setting makes to their heritage significance. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document <i>The Setting of Heritage Assets</i>. As part of the development of the Project design following the consultation on the Preliminary Environmental Information Report (PEIR), the area of solar PV panels in the field to the south-east of the Grade II* listed Hordley House was reduced in order to minimise any potential intervisibility with the house or any location within its grounds The proposed layout is shown on Figures 2.1b and 2.1c in ES Figures 2.1a - 2.4c - Illustrative Masterplan [AS-020]. The detailed assessment of likely impacts of the Project on the heritage significance of Hordley House is presented in paragraphs 1.9.35 – 1.9.38 of ES Appendix 7.5: Settings Assessment [APP-142]. This sets out information regarding the heritage significance of the house and examines the setting of the houses, concluding that <i>‘The setting makes some contribution to the heritage significance of the former farmhouse, with the greatest contribution coming from the grounds of the property’</i>. The assessment found that the heritage significance of the house would be barely affected, resulting in a likely impact of ‘negligible adverse’ magnitude leading to a long-term (time-limited), reversible ‘minor adverse’ effect which is not significant in EIA terms. Any separate assessment of the likely impacts of the Project specifically on the grounds of Hordley House would conclude that effect would be less than for the house itself. This is because the grounds are important for what they contribute towards the significance of the house rather than in their own right. As part of the development of the Project design following the consultation on the PEIR, the area of solar PV panels in the fields to the east of the group of Grade II listed buildings at Lower Dornford Farm was reduced in order to reduce any potential impacts minimise any potential

Comments from Relevant Representations	Response to Relevant Representation
	intervisibility with the house or any location within its grounds The proposed layout is shown on Figure 2.1b in ES Figures 2.1a - 2.4c - Illustrative Masterplan [AS-020]. The detailed assessment of likely impacts of the Project on the heritage significance of the group of Grade II listed buildings at Lower Dornford Farm is presented in paragraphs 1.9.45 – 1.9.50 of ES Appendix 7.5: Settings Assessment [APP-142]. A description of the history of the site is provided in paragraph 1.9.46 and this includes commentary regarding the potential association with the 18th century landscape garden designer Lancelot ‘Capability’ Brown. The assessment found that the heritage significance of the group of Grade II listed buildings would be barely affected, resulting in a likely impact of ‘negligible adverse’ magnitude leading to a long-term (time-limited), reversible ‘minor adverse’ effect which is not significant in EIA terms. If the association with designer Lancelot ‘Capability’ Brown was proven, and elements of the historic landscape could be definitely ascribed to him, any separate assessment of the likely impacts of the Project on such features would conclude that the effect would be no greater than for the group of Grade II listed buildings. This is because the Project design has ensured clear separation from the heritage assets (including any possible designed landscape element) and the existing field boundary would be reinforced with new planting, including trees, which will help to screen the solar PV panels in views from or across the heritage assets.

2. Needs Case

The GT and OGT accept there is a need to balance Renewable Energy Needs and Heritage and Landscape and Heritage Protection including between:

- The national need for large scale solar renewable schemes (i.e. the Project contribution to the meeting of the UK government target of a decarbonised grid by 2035 but this is offtrack). Botley West would contribute about 50% of the Pathways to a Zero Carbon Oxfordshire 2030 target and 1/5 of 2050 target.
- established international, national, and local obligation of government to conserve landscape and heritage assets and ensure local community amenity and wellbeing as set out in national and local policies and guidance.

The Planning Supporting Statement (PSS) **[APP-225]**, para 2.1.4 sets out the basis for need for solar farms and other forms of low carbon energy infrastructure, and Chapter 5 of the ES **[APP-042]** sets out the Alternatives Considered.

The need for renewable energy infrastructure is established by NPS EN-1, which is an overarching national strategy, and which confirms that it is ‘critical national priority infrastructure’. Paragraphs 3.2.6 to 3.2.8 confirm that the Secretary of State “should assess all applications ... on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent”, that “substantial weight should be given to this need” and that it is not necessary to “consider separately the specific contribution of any individual project to satisfying the need established in this NPS”.

Further information is also provided in the Applicant’s ‘Supplementary Statement of Need’ **[PDB-014]**.

Comments from Relevant Representations	Response to Relevant Representation
The GT/OGT are, however, concerned that the proposal does not respond to an overarching national spatial strategy to guide appropriate land use including for solar sites countrywide. The choice of energy sites is currently unplanned and opportunistic. Nor does it provide a national picture of the significance of heritage, ecology, and landscape against which the selection of the Botley West proposal can be seen to have been sequentially evaluated and then selected as an appropriate location.	A summary of the alternatives studied having regard to the environmental effects, including landscape and heritage, are set out in Table 5.1. of Chapter 5 [APP-042]. These included Site location and scale and Site layout and design. These sections answer in detail the way in which the site was selected. The overall approach is found at paras 5.1.1 to 5.2.10 and then at 5.3.1 to 5.3.3 of Chapter 5 [APP-042]. References to the policy context for the consideration of alternatives and how the site was selected, and the factors that influenced this, can be found at paras 5.2.3 to 5.2.10 and again at paras 5.6.1 to 5.6.17. Paras 5.6.1 to 5.6.17 highlight the interplay between factors that the applicant considered. There was no single or determinative factor that influenced the final site chosen or its size; it was a combination of many factors, considered together. Connection capacity at a substation had to be suitable and available or could be made available, but at the same time so was the availability and suitability of land nearby to accommodate a solar farm at scale. Planning and environmental constraints also played a key role in site selection and the scale of the development. Currently there is no 'National Spatial Strategy' against which the Botley West DCO should be judged, but the Planning Supporting Statement [APP-225] has considered and assessed the Project against relevant local and national development policy as part of weighing the planning balance.



Botley West Solar Farm

Applicant Responses to Relevant Representations -
Network Rail Infrastructure Limited [RR-0768]

June 2025

PINS Ref: EN010147
Document Ref: EN010147/APP/11.4

I. Applicants' Comments in response to the Relevant Representation submitted by Network Rail Infrastructure Limited [RR-0768]

Table I-1: Applicants' Comments on Relevant Representations

Comments from Relevant Representations	Response to Relevant Representation
Network Rail is continuing to review the application material, with the intention that further detail will be provided at the written representation stage.	Noted.
We also note that the draft DCO currently does include protective provisions for the protection of the railway however, it is a version which has not been agreed with the Network Rail and therefore Network Rail wish to use their standard protective provisions, on the face of the draft DCO, which will be necessary given the proximate location of the works to the railway and the Applicants request to compulsory acquire several plots of land in Network Rail's ownership.	The protective provisions are in substantially agreed form, save for some provisions that relate to the ability of the Applicant to exercise the powers of compulsory acquisition that are being sought. The Applicant does not disagree to those provisions in principle, but can only agree to include them in the draft DCO once the necessary land agreements are entered into. The Applicant is eager to continue its engagement with Network Rail in order to reach an agreement on the property documents and protective provisions.
The draft DCO proposes to include the power to compulsory acquire the following plots to lay cables under operational railway and for access: 6-05, 6-08, 7-08, 7-13, 7-19, 7-21, 7-23, 7-24, 7-28, 7-29, 7-30, 7-36, 8-17, 8-22, 8-24, 8-25, 9-14, 9-17, 11-25 and 11-29. Network Rail will require their existing rights to be retained, as well any existing rights yet to be determined. Network Rail's preference is for the Applicant to enter into private agreements with Network Rail to obtain the necessary rights to carry out the works instead of compulsory acquisition.	The Applicant's preference is also to enter into a voluntary agreement with Network Rail such that it will not need to rely on the compulsory acquisition powers currently being sought. The Applicant welcomes the agreement of the Heads of Terms with Network Rail and is eager to progress the property document in accordance with the agreed Heads of Terms. The Applicant welcomes Network Rail's continue engagement in this regard.
Network Rail will therefore require Photovoltaic Development Partners to; A) Include Network Rail's standard protective provisions for inclusion in the DCO; B) Enter into a property agreement (most likely an easement) to govern the installation, operation and maintenance of any cable (subject to Network Rail's asset protection process); and C) Enter into a framework agreement that describes and attaches the documents referred to above, the protective provisions, clearance conditions and any necessary basic asset protection agreement, asset protection agreement, structures agreement or other engineering documents required for the benefit and protection of Network Rail's assets.	A) As mentioned above, the protective provisions are in substantially agreed form. They can be finalised once the property and framework agreements are agreed and then the Applicant can update the protective provisions at Part 4 of Schedule 15 of the draft DCO [AS-009] accordingly to reflect the agreed position. B) As mentioned above, the Applicant welcomes the progress made to agree a form of Heads of Terms and is eager to progress discussions with Network

Comments from Relevant Representations

Response to Relevant Representation

Without those agreements and satisfactory protective provisions being in place, Network Rail considers the proposed development, if carried out in relation to the aforementioned plots, would have serious detrimental impact on the operation of the railway and would prevent Network Rail from operating the railway safely and efficiently and in accordance with its Network Licence. Until such agreements are in place, Network Rail is unable to withdraw its objection to the DCO.

Rail in relation to the formal property agreement to govern the installation, operation and maintenance of any cable.

C) The Applicant most recently shared the draft Framework Agreement with Network Rail on 9 May and is awaiting comments.

The Applicant appreciates the need for all of the above documents to be agreed for Network Rail to withdraw its objection and is eager to progress each of those documents as efficiently as possible throughout Examination.



Botley West Solar Farm

Applicant Responses to Relevant Representations -
National Grid Electricity Transmission plc [RR-0760]

June 2025

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I. Applicants' Comments in response to the Relevant Representation submitted by National Grid Electricity Transmission plc [RR-0760]

Table I-1: Applicants' Comments on Relevant Representations

Comments from Relevant Representations	Response to Relevant Representation
The Applicant is seeking temporary and permanent rights over several plots owned by, or containing, NGET rights and assets including those shown on sheet 13 of the Land Plans and referenced in the draft DCO as Works Number 1, 2, 5, 6 and 9. The Applicant is also seeking rights over parcel 13-04 which may be required for the NGET proposed Farmoor substation. NGET's Statutory Duties As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. Additionally, NGET must protect the ability to deliver, operate and maintain its future proposed infrastructure. NGET will therefore require appropriate protection for retained or proposed apparatus, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection. Further discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights. Existing NGET Apparatus NGET owns and operates the following assets that are located within and in close proximity to the Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets impacted are as follows: • Associated overhead and underground apparatus including cables • Overhead Lines: 4TE 400kV OHL – Cowley – Walham Cowley - Minety	The Applicant acknowledges NGET's primary concern being to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. The Applicant appreciates that NGET requires Protective Provisions to be included within the draft DCO to ensure that assets existing at the time of construction of the Project are adequately protected and to ensure compliance with relevant safety standards. The latest draft set of protective provisions were shared with NGET on 13 March 2025 and the Applicant is awaiting a response. The Applicant also appreciates that NGET also requires that the Protective Provisions include protection for its future assets including the Farmoor substation project. The Applicant is considering the precedent protective provisions in the Awel Y Mor DCO as referred to by NGET, for the protection of future assets, and will share a proposed draft set of protective provisions for that purpose in due course. Once the form of both sets of protective provisions is agreed for both existing and future apparatus, the Applicant can update the draft DCO to include both sets of agreed protective provisions.

Comments from Relevant Representations

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Future NGET Apparatus NGET has identified a direct interface between the Project and a NGET infrastructure project. These proposals are part of NGET's Great Grid Upgrade – the largest overhaul of the grid in generations. NGET infrastructure projects across England and Wales are connecting additional renewable energy to homes and businesses. National Grid has a licence obligation to provide connections to the electricity transmission network across England and Wales. This licence obligation to offer connections is set by the energy regulator, Ofgem.

Farmoor substation is a proposed new substation, on a site just south of Farmoor Reservoir, Oxfordshire. The need for a new substation is in direct response to customer demand. There are currently four customers with signed agreements in the area and it is vital to ensure this substation can come forward, irrespective of whether the Project is ultimately built out.

The Project has allowed for the Farmoor substation in its proposals within work number 1 and parcel number 13-04, however this is not the NGET preferred location for this substation. NGET will be seeking its own rights by pursuing a standalone planning permission pursuant to the Town and Country Planning Act 1990 and will promote a compulsory purchase order (CPO) to ensure sufficient land rights can be acquired, if voluntary acquisition of the land is not possible. The location proposed by the Project may be reverted to as a potential 'fallback' development site, if NGET is unable to obtain the necessary consents to develop the Farmoor substation at its preferred site. There is a direct interaction between the Project and the proposed Farmoor substation.

It is therefore essential that the Project and any subsequent development consent order recognises this interaction, and that the protective provisions ensure that future working can be agreed between the parties. It is vital to ensure that there are no restrictions which would prevent the development of the Farmoor substation at the NGET preferred site or at the site proposed within the Project, if this fallback option is ultimately required. NGET must ensure adequate protection for its future projects both in terms of protection for the ability to deliver and operate/maintain future assets, as well as ensuring that future land and rights for the delivery of these projects are not jeopardised. Overarching National Policy Statement (NPS) for Energy EN-1 states that *"to support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of the grid network to facilitate the UK's net zero energy generation development"* (para 4.11.3). This is reflected in the NPS for Renewable Energy Infrastructure EN-3 which states at paragraph 2.8.34 that *"a more co-ordinated approach to offshore-onshore transmission is required."* In line with good practice and the new policy

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considerations in the updated Energy NPS', particularly EN-5, which requires that "2.14.2 the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;"

NGET will co-operate on co-ordination in respect of the Farmoor substation and seek to develop co-ordination and co-operation in the same localities with regards to the Farmoor substation. Protection of NGET Assets NGET will require Protective Provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that assets existing at the time of construction of the Project are adequately protected and to ensure compliance with relevant safety standards. NGET also requires that the Protective Provisions include protection for its future assets including the Farmoor substation project.

The Awel Y Mor DCO provides a precedent for the protection of future assets via Protective Provisions. NGET is liaising with the Applicant in relation to such Protective Provisions. Accordingly, NGET has not appended the version of the Protective Provisions it requires to be included in the Order to this Relevant Representation. However, NGET will submit these at Written Representation Stage, if not agreed between the parties by that point, with an explanation of any outstanding issues. NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for those proposed NGET assets, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions. Compulsory Acquisition Powers in respect of the Project Where the Applicant seeks powers of compulsory acquisition over NGET land or rights, the Protective Provisions must require that the Applicant obtain NGET's consent to any compulsory acquisition of any such land or rights.

NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with Farmoor substation or any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions.