Botley West Solar Farm

STATEMENT OF COMMON GROUND – OXFORDSHIRE COUNTY COUNCIL

EN010147/APP/11.7/10

04 June 2025

NPI-12426
Statement of Common Ground - Oxfordshire County Council
v1
04 06 2025

Approval for issue	
Jon Alsop	4 June 2025

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Prepared for:

Photovolt Development Partners GmbH, on behalf of SolarFive Ltd.

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SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and Oxfordshire County Council.

OXFORDSHIRE COUNTY COUNCIL

[Signature]

[Name]

[Title]

[Organisation]

[Date]

PDVP on behalf of SolarFive

[Signature]

[Name]

[Title]

[Organisation]

[Date]

1 Introduction

1.1 DCO Reference

1.1.1 EN010147/APP/11.7/10

1.2 Date of Examination

1.2.1 May 2025 – November 2025

1.3 Proposed Development

1.3.1 The Applicant is seeking development consent for Botley West Solar Farm (the 'Project'), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic ('PV') solar farm and associated infrastructure with a total capacity exceeding 50 megawatts ('MW'), in parts of west Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.

1.3.2 The Project is classed as a 'nationally significant infrastructure project' ('NSIP') for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a DCO. The application for development consent is being submitted to the planning inspectorate ('PINS'), with the decision on whether to grant a DCO to be made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), as required under the PA 2008.

1.3.3 This Statement of Common Ground (SoCG) has been prepared to support the DCO application made to the Secretary of State under section 37 of the PA 2008 for the proposed Project. The Application has been submitted by SolarFive Ltd (the Applicant).

1.3.4 A Location Plan can be found in the Examination Library at **[AS-024]** and a full description of the Project can be found at ES Chapter 6 - Project Description **[APP-043]**.

1.4 Statement Overview

1.4.1 This Statement of Common Ground ('SoCG') is a working draft document. It comprises a record of consultation held with the relevant SoCG organisation to date as appropriate, and is designed to evolve, representing the ongoing nature of these discussions throughout the Examination period.

1.4.2 An overarching Statement of Commonality **[EN010147/APP/11.6]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.

1.4.3 For the avoidance of doubt, this SoCG comprises contributions from the following environmental topic disciplines:

- Ecology
- Historic Environment
- Agricultural Land Use & Public Rights of Way

- Hydrology and Flood Risk
- Landscape and Visual Resources
- Noise and Vibration
- Traffic and Transport
- Planning Policy

1.4.4 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with Oxfordshire County Council to date:

a. Relevant submission documents and plans
b. Record of relevant correspondence to date
c. Matters that are agreed
d. Matters yet to be agreed
e. Matters that are not agreed

2 Relevant Submissions Documents and Plans

2.1.1 A list of DCO documents and plans of relevance to engagement with Oxfordshire County Council is identified in the tables below for ease of reference.

Table 2.1: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions - Ecology

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/2.2	Streets, Access and Rights of Way Plans	APP-005	November 2024
EN010147/APP/2.6	Statutory and Non-Statutory Sites - Features of Nature Conservation Plan	APP-009	November 2024
EN010147/APP/2.8	Habitats of Protected Species Plan	APP-010	November 2024
EN010147/APP/2.9	Statutory and Non-Statutory Features of Historic Environment Plan	APP-012	November 2024
EN010147/APP/2.10	Hedgerow Removal Plans	APP-013	November 2024
EN010147/APP/3.1	Draft Development Consent Order	APP-015	November 2024
EN010147/APP/6.2	ES Volume 0, Non-Technical Summary	APP-037	P0/ November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 9 Ecology and Nature Conservation	APP-046	P0/ November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.1Statutory Designated Sites	APP-086	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.2 Non-Statutory Designated Sites	APP-087	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.3 a b & c Phase 1 Habitat Map	APP-088	November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 9.1 Desk Study	APP-150	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.2 Phase 1 Habitat Survey Report	APP-151	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.3 Hedgerow Survey Report	APP-152	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.4 Bat Survey Report	APP-153	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.5 Great Crested Newt (GCN) Survey Report	APP-154	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.6 Invertebrate Survey Report	APP-155	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.7 Reptile Survey Report	APP-156	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.8 Badger Survey Report [CONFIDENTIAL]	APP-157	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.9 Breeding Bird Survey Report	APP-158	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.10 Wintering Bird Survey Report	APP-159	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.11 Dormouse Survey Report	APP-160	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.12 Arable Weeds Survey Report	APP-161	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.13 Biodiversity Net Gain Assessment	APP-162	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.14 Habitats Regulations Assessment Report	APP-163	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.15 Veterans Tree Survey Report	APP-164	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.16 Section 42 Consultation Responses	APP-165	P0/ November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	APP-228	November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 1	APP-232	P0/ November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 2	APP-233	P0/ November 2024
EN010147/APP/7.6.2	Outline Operational Management Plan	APP-234	P0/ November 2024
EN010147/APP/7.6.3	Outline Landscape and Ecology Management Plan	APP-235	P0/ November 2024
EN010147/APP/7.6.4	Outline Decommissioning Plan	APP-236	P0/ November 2024

Table 2.2: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Historic Environment

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 7: Historic Environment	CR1-003	Rev 1/March 2025
EN010147/APP/6.5	ES Volume 3, Appendix 7.1: Historic environment desk-based assessment	APP-131	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology	APP-132	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.3: Geophysical survey report, Parts 1-8	APP-133 – APP-140	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment	APP-141	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.5: Settings Assessment	APP-142	November 2024
EN010147/APP/6.5	ES Figures 2.1a – 2.4c – Illustrative Masterplan	AS-020	Rev 1/March 2025
EN010147/APP/6.5	ES Figures 8.248 - 8.371 - Photomontages (Winter and Summer)	APP-072 – APP-080	November 2024

Table 2.3: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Agricultural land use and PRoW

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev01/November 2024
EN010147/APP/6.3	ES Chapter 17 - Agricultural Land Use and Public Rights of Way	APP-054	Rev01/November 2024
EN010147/APP/6.4	ES - Figures 17.1 to 17.6	APP-108 to APP-113	Rev01/November 2024
EN010147/APP/6.5	ES - Appendix 17.1 ALC and Soil Survey Report	APP-223	Rev01/November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	APP-232	Rev01/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/7.6.2	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	APP-233	Rev01/November 2024

Table 2.4: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Hydrology and Flood Risk

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
6.3 - ES Chapter 10 - Hydrology and Flood Risk	Hydrology and Flood Risk	APP-047	November 2024
6.4 ES - Figure 10.1	Study Area	APP-089	November 2024
6.4 ES - Figure 10.2	Hydrological Features	APP-090	November 2024
6.4 ES - Figure 10.3	WFD Catchments (surface water)	APP-091	November 2024
6.4 ES - Figure 10.4	Flood Warnings Alerts	APP-092	November 2024
6.4 ES - Figure 10.5	Drinking Water Protected Areas and Nitrogen Vulnerable Zones	APP-093	November 2024
6.4 ES - Figure 10.6	BGS 150k Bedrock Geology	APP-094	November 2024
6.4 ES - Figure 10.7	BGS 150k Superficial Geology	APP-095	November 2024
6.4 ES - Figure 10.8	WFD Catchments (groundwater)	APP-096	November 2024
6.4 ES - Figure 10.9	Designated Sites	APP-097	November 2024
6.4 ES - Figure 10.10	EA Flood Map for Planning	APP-098	November 2024
6.4 ES - Figure 10.11	Hydraulic Modelling Results	APP-099	November 2024
6.4 ES - Figure 10.12	Water Abstractions, Pollution Incidents and Discharge Consents	APP-100	November 2024
6.5 ES - Appendix 10.1	Flood Risk Assessment	APP-166	November 2024
6.5 ES - Appendix 10.2	Conceptual Drainage Strategy	APP-167	November 2024
6.5 ES - Appendix 10.3	Hydraulic Modelling Report	APP-168, APP-169 and APP-170	November 2024
6.5 ES - Appendix 10.4	Hydrology report	APP-171	November 2024
6.5 ES - Appendix 10.5	Surface Water Modelling Report	APP-172	November 2024
6.5 ES - Appendix 10.6	Surface water and Groundwater abstractions, pollutions incidents and discharge consents Report	APP-173	November 2024

6.5 ES - Appendix 10.7	Water Framework Directive Assessment	APP-174	November 2024

Table 2.5: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Landscape and Visual Resources

Document/Plan Ref.			Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev01/November 2024		
EN010147/APP/6.3	6.3 - ES Chapter 8 – Landscape and Visual Impact Assessment	APP-045	Rev01/November 2024		
EN010147/APP/6.4	Figure 8.128 to 8.243: Representative Viewpoint Photographs (Summer)	APP-065	Rev01/November 2024		
EN010147/APP/6.4	Figure 8.12 to 8.127: Representative Viewpoint Photographs (Winter)	APP-066	Rev01/November 2024		
EN010147/APP/6.4	Figure 8.1-8.3 Site Location	APP-067	Rev01/November 2024		
EN010147/APP/6.4			Figure 8.244: National Character Areas	APP-068	Rev01/November 2024
EN010147/APP/6.4			Figure 8.245: Regional Landscape Character	APP-069	Rev01/November 2024
EN010147/APP/6.4			Figure 8.246: Local Landscape Character Areas	APP-070	Rev01/November 2024
EN010147/APP/6.4			Figure 8.247: District Landscape Character Areas (including ZTV)	APP-071	Rev01/November 2024
EN010147/APP/6.4			Figure 8.248 to 8.371: Photomontages	APP-072 to APP-080	Rev01/November 2024

	(Winter and Summer)		
EN010147/APP/6.4	Figure 8.4-8.6: Landscape Resources Plan	APP-081	Rev01/November 2024
EN010147/APP/6.4	Figure 8.7: ZTV and Representative Viewpoints (Whole Project Overview)	APP-082	Rev01/November 2024
EN010147/APP/6.4	Figure 8.8: ZTV Section Overlaps (Whole Project Overview)	APP-083	Rev01/November 2024
EN010147/APP/6.4	Figure 8.8a: ZTV Bare Earth	APP-084	Rev01/November 2024
EN010147/APP/6.4	Figure 8.9-8.11: Representative Viewpoint and Photomontage Locations	APP-085	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.1: Landscape Character	APP-143	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.2: Landscape Value	APP-144	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.3: Strategic Arboricultural Impact Assessment & Method Statement	APP-145 to APP148	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.4: Photomontage Methodology	APP-149	Rev01/November 2024
EN010147/APP/6.3	Figure 2.1a to 2.4d: Illustrative Masterplan	APP-062	Rev01/November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	APP-228	Rev01/November 2024
EN010147/APP/7.6.3	Outline Landscape and Ecological Management Plan	APP-235	Rev01/November 2024

Table 2.6: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Noise and Vibration

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.3	6.3 - ES Chapter 13 - Noise and Vibration	APP-050	Rev01/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.1 - Construction Phase Noise Study Area	APP-103	Rev01/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.2 - Construction Phase Vibration Study Area	APP-104	Rev01/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.3 - Operational Phase Noise Study Area	APP-105	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.1 Baseline Sound Survey	APP-211	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.2 Construction Phase Noise and Vibration	APP-212	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.3 Operational Phase Noise	APP-213	Rev01/November 2024
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 1	APP-232	Rev01/November 2024
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 2	APP-234	Rev01/October 2024
EN010147/APP/7.6.2	7.6.2 - Outline Operational Management Plan	APP-235	Rev01/November 2024

Table 2.7: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Traffic and Transport

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.3	6.3 - ES Chapter 12 - Traffic and Transport	APP-049	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.1 Description of Network Links and Sensitivity	APP-196	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.2 Traffic Survey Data Part 1	APP-197	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.2 Traffic Survey Data Part 2	APP-198	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.2 Traffic Survey Data Part 3	APP-199	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.2 Traffic Survey Data Part 4	APP-200	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.3 Base Traffic Flows	APP-201	Rev01/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	6.5 ES - Appendix 12.4 Public Transport Networks	APP-202	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.5 Sensitive Receptors	APP-203	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.6 Construction Vehicle Trip Generation Assumptions	APP-204	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.7 Traffic Flows with Construction Traffic	APP-205	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.8 Accesses and highway drawings Part 1 of 4	APP-206	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.8 Accesses and highway drawings Part 2 of 4	APP-207	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.8 Accesses and highway drawings Part 3 of 4	APP-208	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.8 Accesses and highway drawings Part 4 of 4	APP-209	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 12.9 Personal Injury Accident Clusters	APP-210	Rev01/November 2024
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 1 – Outline Construction Traffic Management Plan (Annex A)	APP-232	Rev01/November 2024

Table 2.8: Draft DCO submission documents and plans record pursuant to Oxfordshire County Council discussions – Planning Policy

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
	7.1 Planning Supporting Statement inc. Green Belt Case	APP-225	November 2024

3 Record of Relevant Correspondence

3.1.1 The Project has been the subject of pre-application engagement with Oxfordshire County Council and both parties continue to engage throughout and beyond the submission of the DCO application for the Project.

3.1.2 **Appendix A** identifies the discussions and correspondence that have taken place between the Applicant's project team and Oxfordshire County Council to date.

4 Matters That Are Agreed

Table 4.1: Record of Matters of Specific Agreement to Date - Ecology

Date	Matter	Comment	Outcome
Methodology			
	Survey methodology	Other than where noted below, survey scope and methodology agreed	Agreed
	Assessment approach, scope and methodology	Other than where noted below, assessment approach, scope and methodology agreed	Agreed

Table 4.2: Record of Matters of Specific Agreement to Date – Historic Environment

Date	Matter	Comment	Outcome
	Methodology		
	The scope of ES Volume 1, Chapter 7: Historic environment **[CR1-003]** has been developed with reference to comments received following submission of the Scoping Report and the PEIR, and is acceptable.		Agreed
	The suite of technical guidance adhered to is acceptable.		Agreed
	The desk-based methodology for the establishment of the historic environment baseline is acceptable.		Agreed
	The application of the geophysical surveys within the Project Site is acceptable.		Agreed
	The methodology used for the trial trench evaluation is acceptable.		Agreed
	The methodology used for the assessment of likely impacts and effects is acceptable.		Agreed
	The methodology used for the Cumulative Effects Assessment is acceptable.		Agreed
	The proposed methodologies for the mitigation of potential impacts on buried archaeological remains are acceptable.		Agreed

Table 4.3: Record of Matters of Specific Agreement to Date – Agricultural Land Use and PRoW

Date	Matter	Comment	Outcome
Soils and best and most versatile land			
Deadline 1 (04 June 2025)	No matters of specific agreement to date.	No matters of specific agreement to date.	Discussions remain ongoing.
Public Rights of Way			
Deadline 1 (04 June 2025)	No matters of specific agreement to date.	No matters of specific agreement to date.	Discussions remain ongoing.

Table 4.4: Record of Matters of Specific Agreement to Date – Hydrology and Flood Risk

Date	Matter	Comment	Outcome
['Topic': Insert subheadings where more than one]			
	The scope of 6.3 - ES Chapter 10 - Hydrology and Flood Risk [**APP-047**] has been developed with reference to comments received following submission of the Scoping Report and the PEIR, and is acceptable.		Agreed
	Approach to solar panel drainage.		Agreed
	The suite of technical guidance adhered to is acceptable.		Agreed

Table 4.5: Record of Matters of Specific Agreement to Date – Landscape and Visual Resources

Date	Matter	Comment	Outcome
Up to DL1	No matters of specific agreement to date.	No matters of specific agreement to date.	Discussions remain ongoing.

Table 4.6: Record of Matters of Specific Agreement to Date – Noise and Vibration

Date	Matter	Comment	Outcome
Noise and Vibration			
Deadline 1 (04 June 2025)	None	None	None

Table 4.7: Record of Matters of Specific Agreement to Date – Traffic and Transport

Date	Matter	Comment	Outcome
Traffic and Transport			
Deadline 1 (04 June 2025)	None	None	None

Table 4.8: Record of Matters of Specific Agreement to Date – Planning Policy

Date	Matter	Comment	Outcome
Planning Policy			
	Application of Planning Policy to Decision Making for NSIP's	Section 104 of the Act contains the most pertinent policy outlining the decision-making process for NSIPs and providing guidance on how the Secretary of State (SoS) should approach their decisions. In this respect, Section 104 (3) provides that the SoS must decide applications for development consent in accordance with any National Policy Statement (NPS) except to the extent that the SoS is satisfied that one or more of the following exceptions apply: • that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations; • that deciding the application in accordance with any relevant national policy statement would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under enactment; • That deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment; and	Agreed

Date	Matter	Comment	Outcome
Planning Policy			
		• That the Secretary of State is satisfied that the adverse impact of the proposed development outweighs its benefits. A such, it is agreed that the following NPSs make up the relevant primary policy, against which the SoS must make their decision and to the extent that Section 104 allows, the following national, regional and local policy may also be relevant.	
Relevant Planning Policy Context			
	Overview	The statutory framework for preparing, examining and determining application for DCOs for NSIPs is provided by the Act. As discussed in section 2, the Act sets out the consenting system for all NSIPs, including those in the energy sector, and provides the legislative context that has guided the below considerations. The relevant NPSs to which the SoS must have regard in accordance with Section 104 (2) and 104 (3) of the Act are considered to be: - National Policy Statement for Energy (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and National Planning Statement for Electricity Networks Infrastructure (NPS EN-5). - Other policies of relevance identified below include: National Planning Policy Framework	Agreed

Date	Matter	Comment	Outcome
Planning Policy			
		NPPF and the Local Development Plan documents for the host authorities West Oxfordshire District Council, Cherwell District Council, the Vale of Horse District Council and Oxford City Council. Appendices B to E attached detail national and local planning policy against which the project will be judged. These appendices are described as 'Compliance Tables', and details the applicants position in respect of degree on compliance with these policy statements well as the host authorities position with respect to compliance. Together they represent matters agreed and not agreed	
Oxfordshire County Council (OCC)			
	Oxfordshire Minerals and Waste Local Plan (2017) (adopted)	The adopted Minerals and Waste Local Plan covering Oxfordshire is the Part 1: Core Strategy, adopted by OCC in September 2017. Additionally, 16 'saved' policies from the Minerals and Waste Local Plan (1996), adopted in July 1996 also remain in use for the purposes of development management. The most relevant policies of the Part 1: Core Strategy of the adopted Minerals and Waste Local Plan and the 'saved' polices of the Minerals and Waste Local Plan (1996) are detailed below.	Agreed
	Oxfordshire Minerals and Waste Local Plan (emerging)	OCC are in the process of developing a new Minerals and Waste Plan	Agreed

Date	Matter	Comment	Outcome
Planning Policy			
		for Oxfordshire, up to 2042. The most recent Local Development Scheme, approved by OCC in December 2022 details the decision and timetable to pursue a Minerals and Waste Plan, which would combine parts 1 and 2 of the current Local Plan, into a new Minerals and Waste Plan. The LDS seeks for adoption of the new Minerals and Waste Plan in March 2026. As with other emerging Development Plan Documents, the new Minerals and Waste Plan is still at an early stage, and as such is no considered here. It is likely to advance through the plan-making process during the DCO application timeframe; therefore, the weight to be given to the new Minerals and Waste Plan may increase in accordance with Paragraph 48 of the NPPF as the review reaches more advance stages.	

5 Matters Yet to be Agreed

Table 5.1: Record of Matters yet to be Agreed to Date – Ecology

Date	Matter	Comment	Outcome
	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.	Discussions ongoing.
	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	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	Discussions ongoing.

Date	Matter	Comment	Outcome
	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.	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	The Project will require a licence to address potential effects to GCN populations on and around the site. At this	Discussions ongoing.

Date	Matter	Comment	Outcome
	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 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.	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.	
	Bats		
	.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],	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	Discussions ongoing.

Date	Matter	Comment	Outcome
	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.	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.	
	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 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	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.	Discussions ongoing.

Date	Matter	Comment	Outcome
	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.		
	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 populations through mortality or reduced breeding success.	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	Discussions ongoing.

Date	Matter	Comment	Outcome
		significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general (e.g. Copping *et al*. 2025).	
	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.	Discussions ongoing.
	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.	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	Discussions ongoing.

Date	Matter	Comment	Outcome
	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 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.	permeability of the landscape remains post development	
	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.	Discussions ongoing.

Date	Matter	Comment	Outcome
	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.	XX	Discussions ongoing.
	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]**.	Discussions ongoing.

Table 5.2: Record of Matters yet to be Agreed to Date – Historic Environment

Date	Matter	Comment	Outcome
	The results of the trial trench evaluation will need to be submitted before a full assessment of the 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.	The reports on the results of the programme of archaeological trial trenching within the Order Limits are being prepared and will be submitted into the Examination as soon as possible.	Under discussion

Date	Matter	Comment	Outcome
	The methodology used for the assessment of likely impacts and effects is acceptable.	The scope of the Settings Assessment **[APP-142]** continues to be considered.	Under discussion
	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 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.	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.	Under discussion
	Some technical comments have been submitted to the Applicant regarding proposed amendments to the Outline Written Scheme of Investigation **[CR1-005]**.	A revised version of the Outline Written Scheme of Investigation **[CR1-005]** will be submitted into the Examination at a suitable Deadline.	Under discussion

Table 5.3: Record of Matters yet to be Agreed to Date – Agricultural Land Use and PRoW

Date	Matter	Comment	Outcome
Soils and best and most versatile land			
Deadline 1 (04 June 2025)	**1. Agricultural land use - (RR-0793-063):** 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), 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 [X] 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	Discussions remain ongoing

Date	Matter	Comment	Outcome
		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]**.	
Public Rights of Way			
Deadline 1 (04 June 2025)	**2. Visual amenity of PRoW (RR-0793-033):** 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.	[TBC]	Discussions remain ongoing
Deadline 1 (04 June 2025)	**3. Access to PRoW (RR-0793-033):** 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 commences, during construction and operation, and in the decommissioning and reversion phases when the additional public access provision must not be lost.	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 PRoW Management Strategy (Annex B of the Outline Code of Construction Practice **[APP-232]**), secured under Requirement [X] 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	Discussions remain ongoing

Date	Matter	Comment	Outcome
		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 (post consent).	
Deadline 1 (04 June 2025)	**4. Greenway proposals (RR-0793-033):** 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 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.	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.	Discussions remain ongoing
Deadline 1 (04 June 2025)	**5. Connecting PRoW (RR-0793-033):** Some PRoW on each of the sites need connecting up within the site where possible to provide a high qualify, 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.	Discussions remain ongoing
Deadline 1 (04 June 2025)	**6. Alternative bridleways (RR-0793-033):** 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	The Applicant will continue discussions with OCC following the issue of the LIR.	Discussions remain ongoing

Date	Matter	Comment	Outcome
	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.		
Deadline 1 (04 June 2025)	**7. Crossing PRoW (RR-0793-033):** 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 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.	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 PRoW Management Strategy (Annex B of the Outline Code of Construction Practice **[APP-232]**), secured under Requirement [X] of the Draft DCO **[AS-009]**.	Discussions remain ongoing
Deadline 1 (04 June 2025)	**8. Onsite and offsite mitigation (RR-0793-035):** 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.	The Applicant notes these proposals and will continue to engage with OCC regarding the PRoW network and site specific measures.	Discussions remain ongoing

Date	Matter	Comment	Outcome
	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 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 PRoWs throughout the Project area' (page 43), these PRoWs 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.		
Deadline 1 (04 June 2025)	**9. Additional PRoW (RR-0793-033):** The Consultation Report **[APP-024]** states: that the "Applicant is looking at ways the Project can improve the PRoWs 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 notes these proposals and will continue to engage with OCC regarding this matter.	Discussions remain ongoing
Deadline 1 (04 June 2025)	**10. Financial contribution (RR-0793-036):** 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	The Applicant notes these proposals and will continue to engage with OCC regarding this matter.	Discussions remain ongoing

Date	Matter	Comment	Outcome
	cyclepath (Illustrative Masterplan 01 - 08) Estimated contribution breakdown* Site and habitat surveys & assessments 5% Landowner negotiations and agreement payments 5-10% 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.		
Deadline 1 (04 June 2025)	**11. Proposed and Additional Suggested Active Travel Improvements (RR-0793-038):** 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, indicated by the black line on Figure 1, also using compact gravel or similar. This will enable safe and	The Applicant notes these proposals and will continue discussions with OCC regarding this matter	Discussions remain ongoing

Date	Matter	Comment	Outcome
	continuous connectivity between the public rights of way within the site and ensure the countryside can still be accessed and enjoyed.		
Deadline 1 (04 June 2025)	**12. Bladon to Begbroke walking and cycling route (RR-0793-039):** 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	Discussions remain ongoing
Deadline 1 (04 June 2025)	**13. Strategic walking and cycling connections (RR-0793-040):** 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 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	The Applicant notes these proposals and will continue discussions with OCC regarding this matter	Discussions remain ongoing

Date	Matter	Comment	Outcome
	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.		

Table 5.4: Record of Matters yet to be Agreed to Date – Hydrology and Flood Risk

Date	Matter	Comment	Outcome
	Drainage (as LLFA)		
27/05/2025	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		Discussions ongoing

	site boundaries as an additional measure.	
27/05/2025	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.	Discussions ongoing
27/05/2025	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.	Discussions ongoing
27/05/2025	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.	Discussions ongoing
27/05/2025	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	Discussions ongoing

	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.		
	Assessment of Effects		
27/05/2025			Discussions ongoing
	Mitigation		
27/05/2025			Discussions ongoing
	Outline Construction Traffic Management Plan		
27/05/2025			Discussions ongoing

Table 5.5: Record of Matters yet to be Agreed to Date – Landscape and Visual Resources

Date	Matter	Comment	Outcome
Consultation			
	The representative viewpoints used within the LVIA were agreed with the relevant officer of Oxfordshire County Council at the time of consultation.		Discussions remain ongoing
LVIA Methodology			
Deadline 1 (04 June 2025)	It is acceptable that the Landscape and Visual Impact Assessment [APP-045] has been carried in line with the guidance contained with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute for Environmental Management and Assessment, 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) (published August 2024) (LITGN-2024-01).		Discussions remain ongoing.
Assignment of Significance			
Deadline 1 (04 June 2025)	When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which		Discussions remain ongoing.

	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 "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." Neither the EIA Regulations or GLVIA3, nor 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 set out at sections 8.4 and 8.6 of the submitted LVIA [APP-045]. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24). LI TGN-2024-01 provides clarification in the assessment of effects "…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).	

	In assessing significance of effect, the LVIA has followed the methodology as set out in Sections 8.4 and 8.5 of the LVIA [APP-045]. The numbers of people using the public rights of way network within the 5 m study area varies, as does the distance, 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 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. It is the Applicant's 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 Landscape and Visual Impact Assessment (LVIA) are clear, transparent, correct and proportionate to the Project.	
Suitability of Representative Viewpoint Selection and Photomontages			
Deadline 1 (04 June 2025)	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 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	Discussions remain ongoing.	

	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]. At no point were aerial viewpoints suggested, either by the Applicant or the local planning authorities. GLVIA3 only mentions aerial imagery twice, in the context computer generated 3D models (paragraphs 8.28 and 8.29). Moreover, GLVIA3 explains that such models "do not necessarily represent the way that people would experience the change [in view] and so can be misleading in an assessment context" (GLVIA3, paragraph 8.29). This is especially true of people within vehicles including aircraft, travelling at speed on the approach to, or taking off from airports. The transient nature of potential views available from the air and the enclosed nature of the aircraft would reduce the sensitivity of the visual receptor to such a degree that there is no potential for significant effects. Land-based dynamic receptors are considered at paragraphs 8.6.44 to 8.6.65 of the LVIA [APP-045].	
Mitigation		
Deadline 1 (04 June 2025)	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 main elements, the solar panels, would be low in	Discussions remain ongoing.

	height, at a maximum of 2.3m, and follow the natural contours of the 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. Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that *"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"* (NPS EN-1, paragraph 3.3.63). The NPS explains further that with *"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"* (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.		

Table 5.6: Record of Matters yet to be Agreed to Date – Noise and Vibration

Date	Matter	Comment	Outcome
Noise and Vibration			
Deadline 1 (04 June 2025)	Survey methodology	Survey scope and methodology agreed	Awaiting response
Deadline 1 (04 June 2025)	Assessment approach, scope and methodology	Assessment approach, scope and methodology agreed	Awaiting response

Table 5.7: Record of Matters yet to be Agreed to Date – Traffic and Transport

Date	Matter	Comment	Outcome
	Transport Related Policy		
27/05/2025	The Application has identified and considered the most up-to-date plans and policies as relevant to traffic and transport, within OCC's remit within ES Volume 1, Chapter 12 **[APP-049]**.		Discussions ongoing
	Surveys		
27/05/2025	The site-specific surveys for traffic and transport have been undertaken in accordance with appropriate methodologies and has been collated to appropriately characterise the traffic and transport baseline environment. within ES Volume 1, Chapter 12 **[APP-049].**		Discussions ongoing
	Baseline Environment		
27/05/2025	The baseline environment for traffic and transport has been appropriately characterised within ES Volume 1, Chapter 12 **[APP-049].**		Discussions ongoing
	Study Area		
27/05/2025	The traffic and transport study area is appropriate for the receptors, sites and impacts assessed within ES Volume 1, Chapter 12 **[APP-049]**.		Discussions ongoing
	Assessment Methodology		
27/05/2025	The sensitivity and significance of the traffic and transport receptors has been appropriately and adequately described within ES Volume 1, Chapter 12 **[APP-049]**. The methodologies used in within ES Volume 1, Chapter 12 **[APP-049]** are appropriate for assessing the potential impacts of the Project.		Discussions ongoing
	Project Design Envelope		
27/05/2025	The appropriate Maximum Design Scenario has been used to identify, describe and assess the construction vehicle trip generation, distribution and assignment within ES Volume 1, Chapter 12 **[APP-049]**.		Discussions ongoing

	Assessment of Effects		
27/05/2025	No significant adverse effects on traffic and transport are predicted to arise from the Project either alone or cumulatively with other projects as set out within ES Volume 1, Chapter 12 **[APP-049]**.		Discussions ongoing
	Mitigation		
27/05/2025	The mitigation measures outlined within ES Volume 1, Chapter 12 **[APP-049]** are secured through the Development Consent Order **[APP-015]** and are appropriate and will ensure significant effects are avoided.		Discussions ongoing
	Outline Construction Traffic Management Plan		
27/05/2025	The Outline Construction Traffic Management Plan 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]** and is appropriate with regard to proposed mitigation and monitoring measures.		Discussions ongoing

Table 5.8: Record of Matters yet to be Agreed to Date – Planning Policy

Date	Matter	Comment	Outcome
Planning Policy			
	Compliance with the following NPS paras or development plan policies	1.NPS EN-1 paras: [insert] 2.NPS EN-3 paras: [insert] 3.NPS EN-5 paras: [insert] 4.NPPF paras: [insert] 5.List Development Plans policies [insert]	Discussions ongoing

6 Matters That Are Not Agreed

Table 6.1: Record of Matters that are Not Agreed – Ecology

Date	Matter	Comment	Outcome
Ecology			
Deadline 1 (04 June 2025)	No matters that are not agreed	No matters that are not agreed	No matters that are not agreed

Table 6.2: Record of Matters that are Not Agreed – Historic Environment

Date	Matter	Comment	Outcome
['Topic': Insert subheadings where more than one]			
	There are no Historic Environment matters that are not agreed.		

Table 6.3: Record of Matters that are Not Agreed – Agricultural Land Use and PRoW

Date	Matter	Comment	Outcome
Soils and best and most versatile land			
Deadline 1 (04 June 2025)	No matters that are not agreed	No matters that are not agreed	No matters that are not agreed
Public Rights of Way			
Deadline 1 (04 June 2025)	No matters that are not agreed	No matters that are not agreed	No matters that are not agreed

Table 6.4: Record of Matters that are Not Agreed – Hydrology and Flood Risk

Date	Matter	Comment	Outcome
['Topic':	**Insert subheadings where more than one]**		
28/05/2025			

Table 6.5: Record of Matters that are Not Agreed – Landscape and Visual Resources

Date	Matter	Comment	Outcome
Deadline 1 (04 June 2025)	No matters that are not agreed	No matters that are not agreed	No matters that are not agreed

Table 6.6: Record of Matters that are Not Agreed – Noise and Vibration

Date	Matter	Comment	Outcome
Noise and Vibration			
Deadline 1 (04 June 2025)	None	None	None

Table 6.7: Record of Matters that are Not Agreed – Traffic and Transport

Date	Matter	Comment	Outcome
Ecology			
Deadline 1 (04 June 2025)	None	None	None

Table 6.8: Record of Matters that are Not Agreed – Planning Policy

Date	Matter	Comment	Outcome
Deadline 1 (04 June 2025)	Compliance with the following NPS paras or policies 1.NPS EN-1 paras: [insert] 2.NPS EN-3 paras: [insert] 3.NPS EN-5 paras: [insert] 4.NPPF paras: [insert] 5. Development Plan and other policies [insert]		Discussions ongoing

Appendix A
Record of Relevant Correspondence

Date	Topic	Outcome	Status
Historic Environment			
24/04/23	The Scoping Report states that any land considered to have potential for buried archaeological features may require further archaeological investigations. We would however highlight that geophysical survey on its own cannot be relied upon to identify all possible archaeological features and there are numerous examples within the county where significant archaeological sites have been identified from field evaluation which were not visible on geophysical surveys. As such we would advise that an archaeological evaluation will need to be undertaken across any areas of the site that are likely to be disturbed by this development. This evaluation would need to be undertaken in advance of the determination of any permission for the site in order that the impacts of this proposed development are fully understood when making a decision. The results of this evaluation will need to be incorporated into the cultural heritage chapter of the PEIR.	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.	Under discussion
24/04/23	The Scoping Report states that there will be no effect on buried archaeological remains from decommissioning activities. These activities however do have the potential to impact on archaeological remains particularly when removing cables and areas of hardstanding which are likely, without care and monitoring, remove previously undisturbed areas outside of the original impact.	Mitigation measures to prevent damage to buried archaeological remains during decommissioning are presented within Table 3.1 in the Outline Decommissioning Plan [**APP-236**].	Agreed
November 2023	Meeting with Lead Archaeologist at Oxfordshire County Council.	The areas for HER data acquisition were agreed and the methodologies for geophysical survey were discussed.	Agreed

Date	Topic	Outcome	Status
February 2024	Impacts on Conservation Areas don't appear to have been assessed in the PEIR on the basis that development is not proposed within the Conservation Area boundary. However, it is not only the direct impact on Conservation Areas that need to be considered but also their setting. The development comes in close proximity of several Conservation Areas or is potentially visible from them. The impact on Conservation Areas or their setting does not appear to have been assessed in the Historic Environment chapter or the Landscape and Visual Resources chapter of the PEIR. LVIAs often include representative viewpoints from conservation areas to demonstrate the impact of the development on these designated areas and to demonstrate impacts on residents of these settlements.	An assessment of the likely effects relating to the changes within the settings of Conservation Areas is presented within ES Volume 3, Appendix 7.5: Settings Assessment of the ES [**APP-142**]. This assessment has been informed, where appropriate, by reference to the visualisations presented in ES Figures 8.248 to 8.371 [**APP-072** – **APP-080**].	Agreed
February 2024	Table 7.1 of the PEIR states that the field evaluation highlighted in the NPS requirement and local plan policies has been undertaken and this is misleading and refers only to the geophysical phase. This chapter does however also make clear that an archaeological trenched evaluation will be undertaken.	The field evaluation referenced in Table 7.1 of the PEIR comprised geophysical survey, which is one form of field evaluation. The results of the geophysical survey have been tested through a programme of archaeological trial trenching which commenced in August 2024.	Agreed
February 2024	The PEIR also states that allowance for preservation in situ of significant remains will be made and areas of high significant archaeological remains will be removed from the development. This PEIR also sets out that the individual panels will be connected with string invertors rather than individual cable trenches along each line of panels which will reduce the potential impact on below ground archaeological deposits and that the panels themselves can be mounted on concrete shoes where required in order to preserve areas of significant archaeology. This will allow the evaluation phase to be targeted on areas of impact as set out in this document.	The geophysical survey and review of other data has resulted in the identification of 44 areas containing archaeological remains of probable national or regional significance. These areas have been removed from the developable area and will be protected during construction and then retained as grassland. In areas containing archaeological remains of probable less than regional significance, cables will be placed within ducts that sit on the current ground surface therefore reducing the potential for impact on such remains. This approach is explained within Section 7.8 of ES chapter 7, Historic environment [**CR1-003**].	Agreed
February 2025	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	The Applicant acknowledges Oxfordshire County Council's support of the mitigation strategy in which all areas containing significant archaeological remains	Under discussion

Date	Topic	Outcome	Status
	much supported. The submission of further information is required and it is understood the Applicant will be submitting this in due course.	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**]. 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. These reports are being prepared and will be submitted into the Examination as soon as possible.	
February 2025	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.	Agreed
February 2025	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 agrees that not all surviving archaeological deposits will have been previously identified.	Agreed
February 2025	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 largest impact of such solar farm proposals, which is welcome and has reduced the potential archaeological impact of the scheme.	The Applicant welcomes this comment from Oxfordshire County Council.	Agreed

Date	Topic	Outcome	Status
February 2025	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.	Agreed
February 2025	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.	Under discussion
February 2025	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 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**].	Agreed
February 2025	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 deposits can survive which were not identified by such surveys. Additionally, the nature of such non-intrusive surveys means that 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	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 which examined not only 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	Under discussion

Date	Topic	Outcome	Status
	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 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.	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 where solar PV panels are proposed. The mitigation strategy agreed with the Lead Archaeologist at Oxfordshire County Council is to ensure 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**]. 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 Order Limits are being prepared and will be submitted into the Examination as	

Date	Topic	Outcome	Status
		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**]).	
February 2025	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 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.	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.	Under discussion
February 2025	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	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	Under discussion

Date	Topic	Outcome	Status
	reporting on the results of the archaeological evaluation.	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 submitted into the Examination at a suitable Deadline.	
February 2025	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 Order Limits are being prepared and will be submitted into the Examination as soon as possible.	Under discussion

Date	Topic	Outcome	Status
Agricultural Land Use and Public Rights of Way			
November 2024	Meeting with PRoW Officer from OCC to discuss the proposed management of PRoW within the Project site, including temporary and permanent diversions.	Responses received during the meeting were used to inform the assessment reported in ES Chapter 17 - Agricultural Land Use and Public Rights of Way [**APP-054**] and measures included in the Outline PRoW Management Strategy, which forms Annex B of the - Outline Code of Construction Practice - Part 1 [**APP-232**].	Progressed
Landscape and Visual Resources			
October / November 2022	Correspondences (by email) with all local authorities regarding the selection of Representative Viewpoints.	A detailed log was kept of the responses and any requested for additional/alternative viewpoints. Any changes were incorporated into the PEIR and subsequent ES chapter.	Progressed
January 2023	Meeting held with OCC (including Landscape Officer) to discuss matters arising on Project, including Landscape	Minutes of meeting issued and actioned where necessary.	Progressed
June 2023	Submission of Scoping Report, including LVIA section outlining approach to the assessment, including methodology.	Comments received from the Scoping report are detailed within the LVIA [APP-045] Table 8.5, with details of how they have been addressed.	Progressed
September 2024	Meeting with local authority landscape officers to discuss LVIA specific matters.	Outcome of meeting actioned as part of the PEIR / ES	Progressed
Traffic and Transport			
20 January 2023	OCC advised that the laying of cables would need input from the Network Management Team at OCC.	Meeting with OCC Network Management Team arranged for 02 February 2023.	Progressed
20 January 2023	OCC advised that Traffic Management Plans will be required and that access points should be agreed.	An Outline Construction Traffic Management Plan 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]**.	Progressed

Date	Topic	Outcome	Status
02 February 2023	Discussed the proposals and the requirements for cable laying in the verge and/or highway.	Agreed to set up two workshops to discuss in more detail during March 2023.	Progressed
02 March 2023	Discussion on the alignment of the cable route and the requirements for cable laying in the verge and/or highway.	Agreed that OCC Network Management Team would study the broad location of the cable corridor during workshop on 09 March 2023 with a view to identifying any restrictions that may affect the laying of cables.	Progressed
09 March 2023	OCC Network Management Team studied the broad location of the cable corridor in the context of known constraints and known infrastructure within the verge and highway.	OCC Network Management Team advised they had no concerns with any of the cable route or its laying along the alignment proposed. Agreed that the Applicant would arrange to undertake trial pits at key locations along the cable route to inform micro-siting and whether the cable could be located within the verge or would be within the highway. This will be undertaken post submission of the application for Development Consent.	To be progressed
December 2023, April 2024, June 2024, September 2024 and October 2024	Ongoing discussions and review of the cable corridor in the context of known constraints and known infrastructure within the verge and highway. Discussions on the Highway Authorities and Utilities Committee (HAUC(UK)) statutory suppliers. Discussions on the legal requirements for statutory undertakers. Discussions regarding Solar 5 Ltd and street manager for statutory undertaker status under the generating license. Discussions regarding the draft protective provisions within the draft DCO. Discussions regarding the OCC permit scheme.	OCC Network Management Team advised they had no concerns with any of the cable route or its laying along the alignment proposed. Discussions regarding the legal requirements, statutory undertaker status, street works, protective provisions and the OCC permit scheme have informed the drafting of the Development Consent Order **[APP-015]**.	Progressed
April 2024	The study area has been based on the assumption that all deliveries will arrive and depart the wider area via the A34, however the PEIR stated that at this time	An Outline Construction Traffic Management Plan forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and is secured at	Addressed

Date	Topic	Outcome	Status
	it is not known where deliveries to site will be coming from. The A34 makes connections north south however there are other major roads such as the A40 and A420 which would be the most likely route from other areas and therefore a potential route for HGVs.	Schedule 13 of the Development Consent Order **[APP-015]** which details the construction access routes for HGVs. ES Volume 1, Chapter 12 **[APP-049]** provides a description of the traffic and transport study area which has been established to include all relevant routes along the connecting transport network.	
April 2024	Figure 12.1 shows the links that have been assessed however there is no indication as to how vehicles will be limited to these routes ie will there be a routing agreement included in the DCO and how would this be enforced.	An Outline Construction Traffic Management Plan 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]** which details the construction access routes for HGVs. ES Volume 1, Chapter 12 **[APP-049]** provides a description of the traffic and transport study area which has been established to include all relevant routes along the connecting transport network.	Addressed
April 2024	This is relevant to some links that have a high level of sensitivity but are currently projected to have low movements such as Link 6. What would prevent vehicles using the A4095 to reach the Lower Road site by avoiding the A40? (which is frequently congested and will be subject to major works in the near future).	An Outline Construction Traffic Management Plan 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]** which details the construction access routes for HGVs. ES Volume 1, Chapter 12 **[APP-049]** provides a description of the traffic and transport study area which has been established to include all relevant routes along the connecting transport network.	Addressed
April 2024	OCC have requested that rail services operating at Tackley station be included and the summary of desk study sources used be updated to include all public transport operators.	ES Volume 1, Chapter 12 **[APP-049]** sets out the available public transport within the traffic and transport study area which has been updated to include Tackley Station.	Addressed
April 2024	The Road Safety Data should be extended to include 2022 and 2023 in	A full assessment of highway safety using the most recently	Addressed

Date	Topic	Outcome	Status
	order to have 5 years of data that is not impacted by Covid 19 travel restrictions.	available data including 2022, is included within ES Volume 1, Chapter 12 **[APP-049].**	
April 2024	The descriptions and consideration of Links 13,14 and 16 should be in the context of the committed and commenced developments adjacent to them.	Since PEIR there has been a greater understanding of the build out of the Northern Gateway committed development. As such, the sensitivity of links in the vicinity of this location have been updated. A description of the network links and their sensitivity are set out in Appendix 12.1: Description of network links and sensitivity of the ES **[APP-196].**	Addressed
April 2024	Link 16 has not been taken forward for assessment on a precautionary basis as there are no sensitive receptors identified, however it is adjacent to a Local Plan allocation for which there is a live planning application. Depending on timescales for both projects there could be residential development completed at the time of construction. The cumulative impact of construction traffic relating to both developments could be particularly relevant here.	ES Volume 1, Chapter 12 **[APP-049]** assesses the impact of construction vehicle movements arising from the Project on the Local Road Network and Strategic Road Network and the cumulative impact of traffic and transport on the Local Road Network and Strategic Road Network .	Addressed
April 2024	It is not clear exactly where the site access on Link 21 the B4017 Cumnor Road will be however the assessment does not appear to address the significant pinch point at Filchampsted where the carriageway is narrow, this will need to be assessed if delivery vehicles are to pass through. It should also be noted that despite the lack of footways pedestrians use this route to access the leisure facilities at Farmoor Reservoir and it is a well used leisure cycling route due to the hill between Cumnor and Farmoor.	Details on access routes and arrangements and associated highway works are set out in ES Volume 1, Chapter 12 **[APP-049]**. ES Volume 1, Chapter 12 **[APP-049]** assesses the impact of construction vehicle movements arising from the Project on the Local Road Network and Strategic Road Network and the cumulative impact of traffic and transport on the Local Road Network and Strategic Road Network .	Addressed
April 2024	Specific detailed mitigation measures are still to be determined/designed in detail and the Highway Authority would welcome the opportunity to review these prior to submission.	An Outline Construction Traffic Management Plan 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]**. Any mitigation required in relation to traffic and transport has been set out in ES Volume 1, Chapter 12 **[APP-049]**.	Addressed

Date	Topic	Outcome	Status
April 2024	The CTMP needs to include a mechanism for how vehicle restrictions would work ie identify locations where HGVs can safely layover if they are due to arrive at a restricted time. As highway capacity is limited this should ideally be provided on a suitable area of the site. Overall details of how vehicle movements will be managed through the construction process should be provided.	An Outline Construction Traffic Management Plan 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]**.	Addressed
April 2024	Southern Area: • We note there is no identified preferred route as yet for the cabling across the River Thames at Swinford we request early notification of when this is confirmed in order to assess any implications. • We would like to discuss what the cabling involves in terms of highway impact? Are there opportunities to improve footway cycle way provision off carriageway whilst the cabling work is carried out, particularly on the B4044 between Farmoor and Eynsham?	A Transport Assessment has been integrated into ES Volume 1, Chapter 12 **[APP-049]** in accordance with guidance and best practice. ES Volume 1, Chapter 12 **[APP-049]** assesses the impact of construction vehicle movements arising from the Project on the Local Road Network and Strategic Road Network and the cumulative impact of traffic and transport on the Local Road Network and Strategic Road Network. An Outline Construction Traffic Management Plan 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]**.	Addressed
October 2024	Construction vehicle movements, access strategy and access routes discussed. OCC advised these were sensible and that access routes and management would be the responsibility of OCCs Network Management Team.	A Transport Assessment has been integrated into ES Volume 1, Chapter 12 **[APP-049]** in accordance with guidance and best practice. ES Volume 1, Chapter 12 **[APP-049]** assesses the impact of construction vehicle movements arising from the Project on the Local Road Network and Strategic Road Network and the cumulative impact of traffic and transport on the Local Road Network and Strategic Road Network. An Outline Construction Traffic Management Plan 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]**.	Addressed

Noise and Vibration

Date	Topic	Outcome	Status
April 2024	The proposed noise and vibration assessment methodology was issued to Oxfordshire County Council (OCC) via email.	The noise and vibration assessment which is detailed in 6.3 - ES Chapter 13 - Noise and Vibration [APP-050] follows the methodology which was set-out in the email to OCC.	Yet to be agreed
Ecology			
14/03/2023	Identified biodiversity and approach to Net Gain methodology as a key topic.	Nil.	-
3/05/2023	Overview of ongoing surveys, designated sites and Biodiversity Net Gain.	Nil.	-
3/12/2024	Protected species licensing.	Letters of no impediment to be sought with Natural England for relevant species.	Agreed.
19/09/2024	Set out project update including ongoing design and progress update, Statement of Common Ground, key survey results, Biodiversity Net Gain, ecology strategy and next steps.	Nil	-
Hydrology and Flood Risk			
July 2024	RPS presented the proposed sustainable dranage strategy for the site which was agreed in principal by the LLFA. The LLFA raised no concerns to the presented information.	The approach was verbally agreed and followed up with meeting notes.	Agreed
July 2024	RPS followed up from the meeting with meeting notes and the presentation.	No response was recieved.	-

Appendix B
NPS EN-1 Compliance Table

National Policy Statement for Energy (NPS EN-1), November 2023 Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.2.1	'In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.'	The delivery of the Botley West is a very important part of ensuring the UK Government meets its legally binding net zero obligations and in meeting its goal of 70GW of solar by 2035.	
2.3.3	'Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system.'	The scale of the problem is great; the scale of the solution needs to respond accordingly. Even with the addition of 840MW of renewable energy from the Botley West project, there is still a very significant shortfall of solar projects coming forward to meet the Government's target of 70GW by 2035 (see for example ES Chapter 5, paras 5.1.19 to 5.1.22 ref **[EN010147/APP/6.3]**.	
2.3.4	'Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level ....'	See response to paragraph 2.2.1 and 2.2.3 above.	
3.2.1	'The government's objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios ....'	See response to paragraph 2.2.1 and 2.2.3 above.	
3.2.3	'It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic	The investment provided by PVDP and Solar Five Ltd, for the Botley West project is significant and necessary to increase the supply of this type of Critical National Priority infrastructure.	

	framework set by government ....'	
3.2.4	'It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types ....'	The scale of the problem is great; the scale of the solution needs to respond accordingly. Even with the addition of 840MW of renewable energy from the Botley West project, there is still a very significant shortfall of solar projects coming forward to meet the Government's target of 70GW by 2035 (see for example Chapter 5, paras 5.1.19 to 5.1.22). More renewable energy developments are required, need approval and to be implemented.
3.2.6	**'The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.'**	Some third parties opposing the Project question its need. This statement makes clear that the need has already been demonstrated.
3.2.7	**'In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.'**	This is noted and welcomed by the Applicant.
3.2.8	**'The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.'**	This is noted by the Applicant. However, it is important to also note that all host authorities have declared a climate emergency and Botley West coming forward can help positively address that emergency.
3.3.12	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	Some third parties claim roof top solar can satisfy Government targets in relation to solar (70GW by 2035). However, this statement makes clear that the Government does not believe they will replace the need for new large-scale

	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. This is because connection of large-scale, centralised electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.	electricity infrastructure to meet our energy objectives.
3.3.20	'Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.'	Noted. The Botley West solar farm will perform a critical role in the delivery of net zero by 2050.
3.3.62	'Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states which energy generating technologies are low carbon and are therefore CNP infrastructure.'	Noted. Solar is one such example of low carbon technology and therefore is CNP infrastructure (see 4.2.5 below).
3.3.63	'Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the 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	The weight to attributed to CNP infrastructure in the planning balance is noted and welcome. The Applicant is not aware nor expects any legal impediment that would prevent a positive decision being taken by the Secretary of State in respect of the Botley West Project. The Applicant has mitigated significant adverse effects and is left with residual

	Infrastructure, and it should be progressed as quickly as possible.'	impacts, none of which are considered significant adverse and many of which are beneficial. In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.
3.3.65	'There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.'	Botley West is likely to be one of the first solar NSIP's to connect to the national grid and start supplying affordable, clean and secure energy into the system. A grid connection offer has already been made to the Applicant and it expected to connect to the national grid in 2028. This is a material consideration in the planning balance.
3.3.83	'Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.'	See response to paragraph 3.3.65 above.
4.1.3	'Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.'	The presumption in favour of CNP infrastructure in the planning balance is noted and welcomed. There is no policy at local or national level that clearly indicates that permission should be refused. Whilst there is some conflict with Green Belt policy, very special circumstances exist that outweigh harm caused by inappropriateness and any other harm - see planning balance conclusion and Appendix 8 in this report. In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.
4.1.5	'In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:	Noted. See planning balance conclusion in this report. In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.

	• its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits • its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy'	
4.1.7	'Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development ....'	Noted. Please refer to the planning balance conclusion in this PSS. In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.
Other documents		
4.1.12	'Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.'	Noted. These are set out and assessed in this report. The Applicant considers the Project is compliant or substantially in compliance with relevant Development Plans and other policy documents.
4.1.13	"Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in	Noted. This assessment is set out in this report.

	deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded.'	
4.1.14	'The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it.'	Noted. This assessment is set out in this report.
4.1.15	'In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.'	Noted.
Development consent		
4.1.16	'The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.'	Noted. The Applicant has devised a list of Draft Requirements which meet these tests.
4.2.2	Ensuring the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy. The UK's strategy to increase supply of low carbon energy is dependent on deployment of renewable and nuclear power generation, alongside hydrogen and CCUS. Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale.	Botley West is likely to be one of the first solar NSIP's to connect to the national grid and start supplying affordable, clean and secure energy into the system. A grid connection offer has already been made to the Applicant. The connection date is assumed to be October 2028.
4.2.5	'.... Low carbon infrastructure for the purposes of this policy means: • for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable	Noted. Solar farms fall within the scope of this definition.

generation, including anaerobic digestion and other plants that convert residual waste into energy, including combustion, provided they meet existing definitions of low carbon; and nuclear generation), as well as natural gas fired generation which is carbon capture ready

- for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System
- for other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of “low carbon”, such as hydrogen distribution, and carbon dioxide distribution
- for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of “low carbon”, such as

	interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore • Lifetime extensions of nationally significant low carbon infrastructure, and repowering of projects.'	
4.2.6	'The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.'	The need case and weight to be attributed to renewable projects is noted and Botley West benefits from this support.
4.2.10	'Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.'	Noted. This document clarifies compliance.
4.2.11	'Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.'	Noted. This is the approach that is taken in the Environmental Statement. Residual effects are reported in Chapter 21 of the ES, summarised in Table 22.1. These are the effects after adverse impacts have been the subject of avoidance through design and layout and/or the application of relevant and reasonable mitigation measures.
4.2.12	'Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management.	Noted. This is the approach that is taken in the Environmental Statement.

	The cumulative impacts of multiple developments with residual impacts should also be considered.'	
4.2.13	'Where residual impacts relate to HRA or MCZ sites then the Applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance.'	Noted. There are no residual impacts that relate to HRA or MCZ sites.
4.2.15	"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 ...."	Noted. The Applicant welcomes this consideration.
4.2.16	'As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.'	Noted. This is also the welcomed by the Applicant. See Planning balance and conclusion in this report.
4.2.17	'This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: • where development within a Green Belt requires very special circumstances to justify development; • where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI,	Noted. This is welcomed by the Applicant. See also the Planning balance and conclusion in this report.

	and any broader impacts on the national network of SSSIs. • where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and • where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional'	
4.3.1	'All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.'	The Applicant has submitted an ES with the Draft DCO.
4.3.3	'The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.'	Noted. The Environmental Statement has identified and assessed the likely significant effects on the environment. A Mitigation Measures and Commitment Schedule has also been produced [**EN010147/APP/6.5]**.
4.3.4	'To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information	Noted. This is the approach that is taken in the Environmental Statement.

	could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.'	
4.3.5	'For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project.'	Noted. This is the approach that is taken in the Environmental Statement.
Applicant assessment		
4.3.10	'The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.'	Noted. This is the approach that is taken in the Environmental Statement.
4.3.11	'In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case'	Noted. This is the approach taken in the ES – see in particular Chapter 4 – Methodology, and Chapter 6 – Project Description
4.3.12	'Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.'	Noted. This is the approach that is taken in the Environmental Statement.
4.3.15	'Applicants are obliged to include in their ES, 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.'	Noted. This is the approach that is taken in the Environmental Statement. See also Chapter 5 – Alternatives and Chapter 6 – Project Description.

4.3.17	'Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.'	See response to paragraph 4.3.15.
4.3.24	'The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals'.	Noted. Notwithstanding, the Applicant has set out how they came to select the subject site, the design evolution, and has set out the Very Special Circumstances to explain why development of that part of the site within the Green Belt should be allowed.
4.3.27	'Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.'	Noted.
4.3.28	'Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.'	Noted. This statement may be of relevance to third parties who have sought to suggest alternative sites or approaches to development. Notwithstanding, the Applicant has set out in some detail the site and design evolution of the Project – see Chapter 5 – Alternatives, and Layout and Design Principles document **[EN010147/APP/7.7]**
4.3.29	'It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are	Noted. The main alternative proposed by third parties during consultation has been roof mounted solar or in some cases wind turbines. The Applicant is a solar developer. Wind turbines are considered to give rise to adverse visual effects over a wide area, and unacceptable effects in terms of the setting of The

	particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.'	Blenheim Palace World Heritage site.
Health		
4.4.2	'The direct impacts on health may include • increased traffic • air or water pollution • dust, odour • hazardous waste and substances • noise • exposure to radiation, and • increases in pests'	Noted. Where relevant these matters are addressed in the Human Health Chapter **[EN010147/APP/6.5].**
4.7.2	Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area	The Applicant has limited influence over design of the electrical infrastructure associated with the Project. The NGET substation will ultimately be designed and laid out to meet relevant technical, engineering and safety parameters. However, parameters have been established for the envelope within which this has been assessed (Chapter 6 – Project Description). Design approval of the solar arrays, and other electrical infrastructure will be agreed with the relevant planning authority via a Requirement in the DCO.
4.7.3	Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts	NGET intends to build their substation using Gas Insulated technology rather than Air Insulated technology; this results in a substation that is smaller and quieter than would otherwise be the case, and so is better environmentally in terms of

	such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	visual impact and noise effects. Siting of other noise generating equipment has been undertaken in a way to be remote from sensitive receptors and/or designed with additional mitigation measures to reduce adverse noise effects (Please also refer to Layout and Design Principles documents **[EN010147/APP/7.7]**.
4.12.9	'In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves.'	Noted. However, the Applicant has set out a series of Mitigation Measures and Commitments [**EN010147/APP/7.6** onwards**]**, and a series of Management Plans, the purpose of which is to avoid or reduce relevant adverse environmental effects arising from the Project.
5.11.20	'The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and if it is, whether their proposal may be inappropriate development within the meaning of Green Belt policy (see paragraph 5.11.36 below).'	The Applicant has set out the VSC applicable to their Project within this Planning Supporting Statement (refer to Appendix 8) Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
5.11.34	'The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be	Noted. For full details please refer to Chapter 17 – Agriculture, Landuse and PRoW. **[EN010147/APP/6.3]** Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project outweigh the impact upon BMV land.

	preferred to those of a higher quality.'	
5.11.37	'Very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. However, 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.'	Noted. The Applicant has set out the VSC applicable to their Project within this Planning Supporting Statement. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.

Appendix C
NPS EN-3 Compliance Table

National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) November 2023 Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
General Assessment and Technology Specific Information			
Factors influencing site selection and design			
National designations			
2.3.6	'When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.'	Noted. The location of the Project does not fall within nationally recognised designations. For compliance see Appendices 1 to 7 and Section 4.0 of this PSS. The Applicant considers the Project is in accordance or substantially in accordance with relevant Development Plans and other policy documents.	
2.3.8	'In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target.'	Noted. For full details please refer to Chapter 14 – Heritage **[EN010147/APP/6.3]** and section 4.3 of the PSS. In summary, the Project avoids important underground archaeology, removing development from such areas, and avoids significant adverse effects upon setting through a combination of distance and/or and screening from heritage assets, including The Blenheim Palace WHS. In respect of the latter the Applicant has produced a Heritage Impact Assessment at Appendix 14 of Chapter 9 of the ES.	
Other locational considerations			
2.3.9	'As most renewable energy resources can only be developed where the resource exists and where	The absence of any limit on need is welcomed as is the avoidance of taking a consecutive approach in the	

	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 re-use of previously developed land for renewable technology developments).'	consideration the location of renewables i.e. not giving priority to previously developed land. Please also see Chapter 5 – Alternatives **[EN010147/APP/6.3]** for the explanation and rationale for the Applicants choice of site etc.
Climate change adaption and resilience		
Solar photovoltaic		
2.4.11	'Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: • increased risk of flooding; and • impact of higher temperatures.'	Please refer to Chapter 10 - Hydrology and Chapter 15 on Climate Change. No significant adverse effects are predicted.
Consideration of good design for energy infrastructure		
2.5.2	'Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.'	This project design evolution is described in Chapter 6, Alternatives. Please also refer to the illustrative masterplans, the Landscape, Ecology and Amenities Plan **[EN010147/APP/7.6.3]**, and in the Layout and Design Principles document [**EN010147/APP/7.7]**.
Flexibility in the project details		
2.6.1	'Where details are still to be finalised, applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case.'	Please refer to Chapter 6 – Project Description **[EN010147/APP/6.3]** and the list of Requirements within the Draft Order, which refer to plans/measures requiring subsequent approval.
2.6.2	"Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to	This is the approach that has been taken in the Environmental Statement. For details, please refer to Chapter 4 of the ES, Approach to Assessment [**EN010147/APP/6.3]**

	ensure that the impacts of the project as it may be constructed have been properly assessed.'	
Solar Photovoltaic Generation		
Introduction		
2.10.10	'Solar also has an important role in delivering the government's goals for greater energy independence. The British Energy Security Strategy states that government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is "co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use".'	It is acknowledged by the Applicant that there are many schemes currently in the consenting process. The largest schemes are listed on the PINs website and an analysis of their capacity and status can be found at Annex A. However, even if all of these are consented, built and connected before 2035, this would only add approximately 15.2GW to the 15.8GW of installed capacity reported in the House of Commons briefing paper from May 2024 i.e. a total potential capacity of approximately 31.0GW. This includes the potential contribution of the Project of an anticipated 840MW, and which has the benefit of a confirmed grid connection offer of October 2026 (but for ES purposes is assumed to be October 2028). At this point therefore, there is still a significant shortfall in the 70GW Government target, of approximately 39GW (see DCO Solar Capacity Calculation, Chapter 5, Alternatives, ref **[EN010147/APP/6.3]** The Botley West scheme does not include battery storage; other battery storage facilities are available nearby to help balance the grid. The Botley West Project does retain and support ongoing agricultural use of the land.
2.10.11	'The Powering Up Britain: Energy Security Plan[81] states that government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting	See 2.10.10 for urgency to deliver solar farms and other forms of renewables and response to 2.3.9 in respect avoiding a consecutive approach to prioritising specific land use types to locate renewable energy projects. The Applicant will also retain an agricultural use of the land through conservation grazing, make available up to 30 ha of

	each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.'	land for local food growing initiatives, and make available land for educational use (refer to Chapter 6 of the ES and the oOMP and oLEMP **[EN010147/APP/7.6.2]** and **[EN010147/APP/7.6.3]**.
Applicant Assessment		
Factors influencing site selection and designation		
Irradiance and site topography		
2.10.19	'Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site'	Irradiance has been an important, but not overriding, factor in optimising the design and layout of the Project. See also the Layout and Design Principles document [**EN010147/APP/7.7**].
2.10.20	"In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order further to maximise the solar resource.'	See response to paragraph 2.10.19. The applicant has chosen a fixed rather than rotating scheme.
Network Connection		
2.10.21	'Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5 ....'	The Applicant has been in ongoing discussion with National Grid (NGET) and has the benefit of a grid connection offer from NGET (assumed connection date October 2028). The Applicant has included a new NGET substation within the Order Limits as part of its Draft DCO. See also Chapter 6 for approach to assessment of the NGET substation **[EN010147/APP/6.3]**.
2.10.23	'Larger developments may seek connection to the transmission network if there	Noted – see above.

	is available network capacity and/or supportive infrastructure.'	
2.10.24	'In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.'	Noted. The Applicants' site selection process has been influenced by network capacity leading them to the Project Site (refer to Chapter 5, Alternatives). The current illustrative layout shows the NGET substation within the Order limits and the customer substation adjacent.
2.10.25	'To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.'	The approach to connection is set out in the ES Chapter 6, and the Applicant already benefits from a Grid Connection offer from NGET. Availability of a suitable connection point has influenced the Project site location (see Chapter 5, Alternatives).
2.10.26	"Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.'	The Applicant has undertaken a cumulative impact assessment should the proposed location of the NGET substation be moved to an adjacent site. In this scenario the Applicant assumes its own infrastructure will replace the current NGET site.
Proximity of a site to dwellings		
2.10.27	'Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections below'	Noted. Recognising that landscape and visual effects are one of the main environmental effects arising from solar farms, the Applicant has adopted a landscape led approach to the design and layout of the Project. Retention and enhancement of the existing landscape character has been one of the central features of the Project (See Landscape and Visual Resources chapter **[EN010147/APP/6.3]** and Layout and Design Principles Document [**EN010147/APP/7.7**].
Agriculture land classification and land type		
2.10.28	'Solar is a highly flexible technology and as such can be deployed on a wide variety of land types'	It is also noted that solar is a CNP, and currently deployment of solar is significantly short of the Government's target of 70GW by 2035 (see for example ES Chapter 5, paras 5.1.19 to 5.1.22 **[EN010147/APP/6.4]**
2.10.29	'While land type should not be a predominating factor in	Then Applicant has explained its rational for the selection of

	determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible. 'Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification'	the subject site (see Chapter 5 of the ES. Effects upon soils/BMV are considered in detail in Chapter 17– Agriculture, Landuse Soils and PROW **[EN010147/APP/6.3].** No significant adverse effects are predicted. Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project outweigh the impact upon BMV land.
2.10.30	'Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92 and 2.10.107 – 2.10.126.'	All these impacts are considered within relevant chapters within the ES and at section 4.3 of this PSS. No significant adverse effects are predicted.
2.10.31	'It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.'	Then Applicant has explained its rational for the selection of the subject site (See Chapter 5 – Alternatives **[EN010147/APP/6.3]**.
2.10.32	'Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use.'	The Applicant does propose continued agricultural use – see Chapter 6 – Project Description **[EN010147/APP/6.3]**.
2.10.33	'The Agricultural Land Classification (ALC) is the	Soil sampling has been undertaken and has informed

	only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.'	the Soil Management Plan and other management plans **[EN010147/APP/7.6.1]**.
2.10.34	'Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030.'	The Applicant has produced a Soils Management Plan **[EN010147/APP/7.6.1]**
Accessibility		
2.10.35	'Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.'	The Applicant has defined and assessed the use of relevant links on the public highway during construction and operation. Full details are contained with Chapter 12– Highways. **[EN010147/APP/6.3]**. No significant effects are predicted.
2.10.36	'Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting.'	See response to paragraph 2.10.35 above.
2.10.37	'Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.'	Internal maintenance roads are shown on the illustrative masterplans (see Figure 2.1a to 2.3 inclusive **[EN010147/APP/7.6.4]**. New pedestrian access routes are shown on the Landscape, Ecology and Amenities Plan **[EN010147/APP/6.3]**. No

		significant earthworks are envisaged – of note, however, is a new water storage feature proposed north of Cassington, in order to reduce the effects of flooding that the village currently experiences intermittently. New earth bunds are also proposed in the same location to further assist in diverting water away from the village.
2.10.38	'In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.'	Four new vehicular access points have been designed to serve the four construction compound areas **[EN010147/APP/7.3.1 and 7.3.6]**. The Applicant has used existing field accesses into the Project site where possible; this will also assist in the continued agricultural use of the site.
2.10.39	'Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	This is the approach taken within the ES.
Public rights of ways		
2.10.41	"Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.'	The Applicant has considered the effect of the Project upon existing rights of way (Please refer to Chapter 17– Agriculture, Land Use and PRoW and Health Chapter 16 **[EN010147/APP/6.3]**). Some adverse effects are predicted in the short term only.
2.10.42	'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.'	This is the approach taken with the proposed development. PRoW diversions are proposed in four locations – see Chapter 16). New pedestrian access routes have also been created to increase access to this part of the countryside. A new permissive path was proposed by the Applicant during the consultation exercises along the route of the Evenlode. No third party expressed a wish for this to be delivered and so is not included in the Applicants submission.
2.10.43	'Applicants are encouraged where possible to minimise the visual impacts of the	The layout of the solar installation, the height of the solar arrays (reduced height

	development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.'	post the PEIR), combined with existing and new landscaping has, in combination, led to the avoidance or minimisation of adverse visual impacts of the Project upon sensitive receptors.
2.10.44	Applicants should consider and maximise opportunities to facilitate enhancements 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 (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.'	This is the approach taken with the Project. Existing rights of way have been retained and proposed to be enhanced. The Applicant has also consulted upon and now incorporated the provision of new pedestrian access routes (refer to Landscape, Ecology and Amenities Plan **[EN010147/APP/7.3.3]**).
2.10.45	''Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.'	The Applicant has produced an outline Public Rights of Way Management Plan within the outline Code of Construction Practice and Operational Management plan **[EN010147/APP/7.6.1]**.
Security and lighting		
2.10.46	'Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.'	The Applicant is proposing lighting and security cameras and fencing. See Chapter 6, Table 6.3 **[EN010147/APP/6.3]**
Technical Considerations		
Capacity of a site		
2.10.53	'From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.'	The total installed capacity is approximately 936,000 kVA Total apparent power in AC).
2.10.55	"The installed generating capacity of a solar farm will	The Applicant has assumed some degradation of the panels

	decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays."	over time, and replacement as necessary. Details are contained in Chapter 14 – Climate Change and in Chapter 12 Transport **[EN010147/APP/6.3]**.
2.10.56	'AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to set the maximum extent of development when determining the planning impacts of an application.'	In table 6.3 of Chapter 6, the Applicant assumes a range for the following: total installation areas for the solar arrays; an indicative range for the number of solar modules; and an indicative dimension of the PV modules.
2.10.58	"In particular, any permissions granted on the basis of a DC installed generating capacity should be built on that basis, unless an amendment is made to that permission and the difference in impacts is considered.	The Applicant does not wish to consent to be controlled by limitation to its generation capacity. Instead, as with other solar DCO consents (e.g. Mallard Pass, Gate Burton and Cottam), it wishes to secure consent by reference to when decommissioning is to start. As such Requirement 15 of the draft Order states that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.
Site layout design, and appearance		
2.10.59	'Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.'	See NPS EN-1 table above and section 4.7.2 and 4.7.3 within that table.
2.10.60	As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use, and ability to mitigate environmental impacts and flood risk.'	See Chapter 5 – Alternatives, and the Layout and Design Principles Document **[EN010147/APP/7.7]**, where the approach to site selection and layout and design refinement and control is set out.
2.10.61	'For a solar farm to generate electricity efficiently the	The Applicant has continued to refine the layout of the solar

	panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.'	installation having regard to power output, engineering, and planning and environmental considerations. The illustrative layout can be found in Figures 2.1 to 2.3 inclusive **[EN010147/APP/6.4]**
2.10.62	'In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen. For example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread more evenly throughout the day.	The Applicant has continued to refine the layout of the solar installation having regard to power output, engineering, and planning and environmental considerations. The illustrative layout can be found in Figures 2.1 to 2.3 inclusive **[EN010147/APP/6.4]** and the description of the design evolution is contained in Chapter 5 of the ES **[EN010147/APP/6.3]**
2.10.63	'It is likely that underground and overhead cabling will be required to connect the electrical assets of the site, such as from the substation to the panel arrays or storage facilities.'	No overhead cabling is proposed by the Applicant. However, where cabling crosses important archaeology, cables will be laid on the surface of avoid damage to the heritage asset.
2.10.64	'In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.'	The Applicant has produced a report which provides details of cable laying methods, Volume 3, Appendix 6.2 **[EN010147/APP/6.7]**. An oOMP is also produced which describes the proposed operation and maintenance regime **[EN010147/APP/7.6.2]**.
Project lifetime		
2.10.65	'Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.'	The Applicant wishes to secure consent by reference to when decommissioning is to start. As such Requirement 15 of the draft Order states that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.
2.10.66	'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	The Applicant seeks a temporary consent primarily because much of the site is within the Oxfordshire Green Belt. The Applicant considers it important to allow the Project to generate much needed renewable energy but for the

	consent or be decommissioned and removed.'	Green Belt to continue to perform its function in the longer term for planning purposes. The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. Notwithstanding, paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
2.10.67	Solar panel efficiency deteriorates over time and applicants may elect to replace panels during the lifetime of the site.'	The Applicant is assuming that replacement panels will be required over time and has allowed for this eventuality – Appendix 14.2 **[EN010147/APP/6.5]**.
Decommissioning		
2.10.68	'Solar panels can be decommissioned relatively easily and cheaply. The nature and extent of decommissioning of a site can vary. Generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue.'	The Applicant describes its decommissioning proposals in Chapter 6 and in the Decommissioning Plan (see ref **[EN010147/APP/7.6.4]**). See also the Applicant's response to 2.10.66 above.
2.10.69	'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.'	The Applicant describes its decommissioning proposals in Chapter 6 and in the Decommissioning Plan **[EN010147/APP/7.6.4]**. Some of the key benefits of the Project is not only the renewable energy it will produce, but the considerable enhancement it will make to the landscape with the very significant new planting proposed, but also the biodiversity gain it will achieve, increased public access and educational benefits.
Flexibility in the project details		
2.10.70	'In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include:	Details of the project parameters are set out in Chapter 6 of the ES and the Layout and Design Principles document **[EN010147/APP/7.7]**

	• the type, number and dimensions of the panels; • layout and spacing; • the type of inverter or transformer; and • whether storage will be installed (with the option to install further panels as a substitute).'	which set out control and delivery measures.
2.10.71	'Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.'	Details of the project parameters are set out in Chapter 3 and 6 of the ES.
2.10.72	'Guidance on how applicants should manage flexibility is set out at Section 2.6 of this NPS.'	Details of the project parameters are set out in Chapter 3 and 6 of the ES.
Impacts		
Biodiversity, ecological, geological conservation and water management		
2.10.76	'The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.'	Details of the ecology assessment, impacts and mitigation are contained within Chapter 9 of the ES and in the Mitigation and Commitments schedule **[EN010147/APP/6.5]**.
2.10.77	'Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.'	Relevant surveys have been undertaken.
2.10.78	'The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.'	The Applicants has employed experienced and competent ecologists to advise on the scheme, and secure substantial BNG. In particular, Mr Guy Parker of Wychwood Ecology Ltd has worked with RPS's ecologists to bring his expertise to bear on the delivery of the BNG and management of the site based upon his recent experience with the Southill Solar Farm in Oxfordshire and Boxsted Solar Farm in Essex. Dr Peter Shepherd of BSG ecology has also been employed to bring his knowledge and expertise in

		respect of bat populations that exist in and around the Project Site.
2.10.79	'The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should specify mitigation to avoid or minimise these impacts, and any further surveys required.'	Details of the ecology assessment, impacts and mitigation are contained within Chapter 9 of the ES and in the Mitigation and Commitments schedule Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**.
2.10.80	'Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.'	A Soils Management Plan has been produced and describes how soils will be managed **[EN010147/APP/7.6.1]**.
2.10.81	'Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at paragraphs 2.10.33 and 2.10.34.'	A Soils Management Plan has been produced and describes how soils will be managed **[EN010147/APP/7.6.1]**.
2.10.82	'Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.'	The Applicant has considered this and lighting type, location and use will be controlled in the oCMP, the oLEMP and reflected in the Mitigation and Commitments Schedule [**EN010147/APP/6.5]**.
2.10.83	'Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction and design of any fencing should account for enabling mammal, reptile and other fauna access into	Hedgerow removal has been minimised and where removal is proposed surveys have been undertaken to describe associated impacts and effects. Substantial hedgerow planting is proposed, and the Layout and Design Principles document **[EN010147/APP/7.7]** references the control measures to be adopted by the Project including the buffers proposed throughout the site. The oLEMP also describes how fencing will

	the site if required to do so in the ecological report.'	allow for access for mammal, reptile and other fauna.
2.10.84	'Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.'	This is included in ES Volume 3 Appendix 10.1: Flood Risk Assessment **[EN010147/APP/6.5]**.
2.10.85	'Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches, should be used to control any run-off where recommended.'	Access tracks are proposed and where surfacing is proposed, that will be permeable avoiding or minimising effects on surface water run-off. Any access tracks located within Flood Zone 1, 2 and 3 have been subjected to the sequential test and exception test. Where required, appropriate mitigation measures are outlined within Volume 3, Appendix 10.1: Flood risk assessment **[EN010147/APP/6.5]**.
2.10.86	'Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.'	The conceptual drainage strategy is presented within Appendix 10.2: Conceptual Drainage Strategy **[EN010147/APP/6.5]** and has been developed in accordance with 2023 NPS, NPPF, PPG ID7 the SuDS Manual and local council policy. The Conceptual drainage strategy considers existing and proposed runoff rates, the hierarchy of drainage and how SuDS can be incorporated within the proposed design.
2.10.87	'Culverting existing watercourses/drainage ditches should be avoided.'	Culverting is not proposed by the Applicant
2.10.88	'Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.'	Culverting is not proposed by the Applicant
2.10.89	'Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some	Substantial BNG is planned for the Project site – Volume 3, Appendix 9.13 [**EN010147/APP/7.6.3]** The Defra Statutory BNG Metric has been used to demonstrate

	instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged.'	net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. The oLEMP **[EN010147/APP/7.6.3]** will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.
2.10.90	'For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.'	The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. The oLEMP **[EN010147/APP/7.6.3]** will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.
2.10.92	'Applicants should consider whether they need to provide geotechnical and hydrological information (such as identifying the presence of peat at each site) including the risk of landslide connected to any development work.'	Ground conditions are described in Chapter 11 of the ES and soil types are also described in Chapter 11 and 17. No peat is present. Hydrological information is contained in Chapter 10 **[EN010147/APP/6.3]**
Landscape, visual and residential amenity		
2.10.94	'The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.'	Chapter 8 describes the ZTV of the Project. **[EN010147/APP/6.3]**
2.10.95	'However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised.'	As the design and layout of the Project evolved refinements included removing solar arrays on more exposed high ground and lowering of the panel heights have assisted in reducing the visual effects of the Project. This combined with the management of the exiting landscape structure (e.g. allowing existing hedgerow to grow up to a height to screen development) and the

		substantial new planting proposed is designed to provide effective screening from year 5 and beyond (see Landscape and Visual Chapter 8).
2.10.96	'Landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre-application process.'	Notwithstanding that the Project does not fall within any National Landscape, one of the key priorities in the course of the evolution of the design and layout of the Project has been to prioritise, where possible, a landscape led approach to the development. As a result, maximum use has been made of existing landscape features when siting development, substantial new planting is proposed, and development has been stripped back from higher ground all in order to avoid or minimise adverse impacts in visual and character terms.
2.10.97	'Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.'	The landscape and heritage consultant have worked together to avoid or minimise significant adverse effects upon heritage assets and other sensitive receptors. Representative viewpoints have been chosen and photomontages produced to describe visual effects of the development (refer to Chapter 7 and 8 **[EN010147/APP/6.3]**).
2.10.98	'Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.'	See response above to paragraphs 2.10.96, 2.10.97 and section 4.3 of this PSS.
2.10.99	'Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact..'	The Applicant, where possible, has placed fencing behind existing or proposed planting in order avoid to reduce adverse visual effects of fencing and other security measures.
2.10.100	'`The applicant should consider as part of the design, layout, construction, and future maintenance	The Applicant has adopted a landscape led approach to the layout and design of the Project, maximising the use of existing

	plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.'	landscape features (hedgerows, trees and woodland) when siting development, imposing appropriate buffer distances to protect existing features, proposing substantial new planting in key areas, and stripping development back from higher ground, all in order to avoid or minimise adverse impacts in visual and character terms. Individual veteran trees have also been identified and protected throughout the Project Site.
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.'	The Applicant has retained the vast majority of existing landscape features throughout the Project Site, with only limited hedgerow removal. Hedgerow surveys have been undertaken and effects reported within the Ecology and Landscape Chapters 9 and 8 of the ES **[EN010147/APP/6.3]**.
Glint and glare		
2.10.102	'Solar panels are specifically designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun's rays at certain angles, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.'	The Applicant has undertaken a Glint and Glare assessment. Mitigation measures adopted and no residual adverse effects are predicted – Volume 3, Appendix 4.4 **[EN010147/APP/6.5]**
Cultural Heritage		
2.10.107	'The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.'	The Applicant has assessed above and below ground heritage assets including potential effects upon The Blenheim Palace World Heritage Site (WHS) - see Volume 3, Appendix 7.4 **[EN010147/APP/6.3 and 6.5]**. No significant effects are predicted. Substantial harm to

		heritage assets is also avoided and so complies with planning policy requirements.
2.10.109	'Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.'	The Applicant has agreed a WSI with the County Archaeologist **[EN010147/APP/7.6.5]**. This includes an agreed approach of protection of underground archaeology. Positive effects are predicted as the Applicant has removed development from all identified areas of potential archaeological significance i.e. a no dig approach. In addition, where cabling crosses important areas of underground archaeology, cables will be laid on the surface to avoid damaging the asset.
2.10.110	'Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.'	See above response to 2.10.109.
2.10.112	'Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	The applicant has undertaken a desk top exercise, examining all relevant records relevant to the site, examined photographic records and undertaken extensive geophysical surveys of the site. Trial trenching is also underway, with the results of this being reported shortly after submission of the DCO in agreement with the County Archaeologist and Historic England. **[EN010147/APP/7.6.5]**
2.10.113	'Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate	See response to 2.10.122 above. Setting of heritage assets has also been considered by the Applicant and appropriately protected by reason of distance from the receptor and/or screening. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.

	schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.'	
2.10.114	'In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.'	The approach to identification, evaluation and protection of heritage assets has been agreed with the County Archaeologist **[EN010147/APP/7.6.5]**. The Applicant continues to work with HE in respect of the HIA study which addresses effect upon The Blenheim Palace World Heritage Site see Volume 3, Appendix 7.4 **[EN010147/APP/6.5]**. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.
2.10.115	'The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area.'	The approach to identification, evaluation and protection of underground heritage assets has been agreed with the County Archaeologist **[EN010147/APP/7.6.5]**.
2.10.116	'Applicants should take account of the results of historic environment assessments in their design proposal.'	The Applicant has removed development away from areas identified as having potential archaeological importance. Setting of heritage assets has also been considered by the Applicant and appropriately protected by reason of distance from the receptor and/or with the introduction of landscape screening. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.
2.10.117	"Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.'	See response to paragraph 2.10.116 above. A WSI has also been agreed with the County Archaeologist see Volume 3, Appendix 7.4 **[EN010147/APP/7.6.5]**.
2.10.118	'As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration	The Applicant has removed development away from areas identified as having potential archaeological importance. Setting of heritage

	should be given to the impact of large-scale solar farms which depending on their scale, design, and prominence, may cause substantial harm to the significance of the asset.'	assets has also been considered by the Applicant and appropriately protected by reason of distance from the receptor and/or with the introduction of landscape screening. The Applicant continues to work with HE in respect of the HIA study which addresses the potential effect upon The Blenheim Palace World Heritage Site **[EN010147/APP/7.6.5]**. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.
2.10.119	'Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.'	Visualisations and cross sections have been produced by the Applicant in the HIA report **[EN010147/APP/7.6.5]**.
Construction including traffic and transport noise and vibration		
2.10.120	'Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the delivery and assemblage of the necessary components.	The Applicant has given detailed consideration to vehicular access requirements for construction and operation. In particular, the general approach for construction is to deliver all materials into the four main Construction Compound sites as identified on the Temporary Facilities pan **[EN010147/APP/7.6.5]**, from which materials will be distributed as necessary throughout the wider site. Detailed consideration has also been paid to the design and layout of the accesses proposed to serve these compound areas and these details are shown at Figures **[EN010147/APP/7.3.1]**.
2.10.121	'Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farms will derive mainly from the effects of traffic movements, which is likely to involve smaller vehicles than typical onshore energy infrastructure but may be more voluminous.'	An assessment of the traffic and transportation effects of the development is reported in Chapter 12 of the ES. This chapter sets out the assumptions on which the assessment is based including the delivery routes to be used during the construction phase. No significant adverse effects are predicted.
2.10.123	'Applicants should assess the various potential routes	See response to paragraph 2.10.121 above.

	to the site for delivery of materials and components where the source of the materials is known at the time of the application and select the route that is the most appropriate.'	
2.10.124	'Where the exact location of the source of construction materials, such as crushed stone or concrete is not be known at the time of the application, applicants should assess the worst-case impact of additional vehicles on the likely potential routes.'	See response to paragraph 2.10.121 above
2.10.125	'Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES.'	See Applicants' response to paragraph 2.10.121 above. The Works Plans and schedules within the draft DCO describe the works required for access purposes **[EN010147/APP/2.3]**
2.10.126	"Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary.'	The Applicant has undertaken a cumulative effects assessment with other relevant development – Chapter 20 [**EN010147/APP/6.3**]. No significant effects are predicted.
Secretary of State decision making		
Factors influencing site selection and design		
Agriculture land classification and land type		
2.10.145	'The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land.	The assessment of effects in respect of BMV is set out in Chapter 8 of the ES and section 4.3 of this PSS. A Soil

	The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.'	Management Plan is proposed **[EN010147/APP/7.6.1]**. Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project outweigh the impact upon BMV land.
Technical Considerations		
Project lifetime and decommissioning		
2.10.146	'The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable ...'	The Applicant has provided an outline Decommissioning Plan as part of the ES and DCO **[EN010147/APP/7.6.4]**.
2.10.147	'Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity.'	The Applicant does not wish to consent to be controlled by limitation to its generation capacity. Instead, as with other solar DCO consents (e.g. Mallard Pass, Gate Burton and Cottam), it wishes to secure consent by reference to when decommissioning is to start. As such Requirement 15 of the draft Order states that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.
2.10.148	'Such a requirement should also secure the decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life.'	The Applicant has prepared a Decommissioning Plan which is secured by Requirement **[EN010147/APP/7.6.4]**.
2.10.149	'An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.'	The Applicant seeks a temporary consent for the development – see response to paragraph 2.10.147 above.
2.10.150	'The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.'	The Applicant seeks a temporary consent for the development – see response to paragraph 2.10.147 above.
2.10.151	'The Secretary of State should consider the period of time the applicant is	Noted. The Applicant considers these effects within relevant chapters of the ES, and in the

	seeking to operate the generating station, as well as the extent to which the site will return to its original state, when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.'	conclusion on the planning balance at section 4.0 of this PSS.
Impacts		
2.10.152	'The impacts identified in Part 5 of EN-1 and below, are not intended to be exhaustive.'	Noted.
2.10.153	'The Secretary of State should consider any impacts which it determines are relevant and important to its decision.'	Noted. The Applicant believes it has assessed all relevant impacts to allow a decision to be made.
Biodiversity, ecological, geological conservation and water management		
2.10.154	'Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.'	The Applicant has sought to optimise the environmental advantages of the development, and incorporates significant BNG and this, together with other environmental improvements, are set out in the oLEMP. Of note is the ability of the Applicant to manage the Evenlode corridor to bring that area into a more favourable conservation status, and the proposal to create a water attenuation feature and associated bunding designed to avoid or reduce flooding that has historically occurred in the village of Cassington.
2.10.155	'The Secretary of State must consider the worst-case effects in its consideration of the application and consent.' '	The Applicant has assessed the likely worst case effects arising from the development (see Chapter 4 of the ES, Approach to Assessment).
2.10.156	Where developments are proposed on peat, to ensure the development will result in minimal disruption to the ecology, or release of CO2, and that the carbon balance savings of the scheme are maximised, the Secretary of State should be satisfied that the solar farm layout and construction methods have been designed to	No peat is present on the Project Site.

	minimise soil disturbance during construction and maintenance of roads, tracks, and other infrastructure and in England should take into account the policies set out in the England Peat Action Plan 2021 ....'	
Landscape, visual and residential amenity		
2.10.157	'The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks, The Broads and Areas of Outstanding Beauty) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.'	Adverse landscape and visual effects of the development have been avoided or minimised as a result of continuous refinements to the Project layout and design. Relevant environmental effects and mitigation measures are set out with the Landscape and Visual Effects Chapter of the ES, in the Layout and Design Principles Document **[EN010147/APP/7.7]**, and in the Mitigations and Commitment Schedule **[EN010147/APP/6.5]**. Whilst some short term some adverse effects are predicted during construction and in Year 1 in winter, these effects diminish and are avoided after year 5. Overall, the site is capable of absorbing the development without giving rise to unacceptable adverse effects. The effects of the solar farm are temporary and reversible and will ultimately lead to a significant biodiversity and landscape enhancement of the area.
Glint and glare		
2.10.158	'Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).'	The Applicant has undertaken a Glint and Glare Assessment and no significant adverse effects have been found – Volume 3, Appendix 4.4 **[EN010147/APP/7.6.5]**.
2.10.159	'Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no	See response to paragraph 2.10.158 above.

	evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms.'	
Cultural Heritage		
2.10.60	'Solar farms are generally consented on the basis that they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.'	The Applicant seeks a temporary consent and reports upon relevant effects within all topic chapters in the ES (e.g. Chapter 7, Historic Environment [**EN010147/APP/6.3**]). No adverse effects are predicted, and some beneficial effects are expected.
Construction including traffic and transport noise and vibration		
2.10.161	'Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.'	The assumptions underpinning the Traffic and Transportation effects are set out within Chapter 12 **[EN010147/APP/6.3]** of the ES and relevant appendices within Volume 3, Appendix 12 **[EN010147/APP/6.5]**
2.10.162	'The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.'	In respect of traffic and transportation effects there will be no significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases.

Appendix D
NPS EN – 5 Compliance Table

National Policy Statement for Electricity Works Infrastructure (NPS EN-5) Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
Assessment and Technology-Specific Information			
Introduction			
2.1.4	'Decommissioning of electricity networks is not specifically covered in this NPS. Generally, nationally significant electricity networks are likely to have an ongoing function, but will be subject to maintenance, reinforcement works and for assets to be replaced when they come to the end of their lifespan.'	Noted. The Applicant has prepared a Decommissioning Plan for the Project **[EN010147/APP/7.6.4]**. It assumes that the NGET substation will remain in situ once consented and commissioned.	
2.1.5	'As stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure ....'	Noted. The Applicant is proposing associated electrical infrastructure to enable connection to the NGET substation; this infrastructure will attract CNP status in policy terms.	
Factors influencing site selection and design			
2.2.1	'The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.'	In the case of the Botley West solar farm, the Applicant intends to secure consent for a new NGET substation within its Order Limits. The subsequent consent will be transferred to NGET to build out and commission **[EN010147/APP/3.1]**.	
2.2.2	'Siting is determined by: • the location of new generating stations or other infrastructure requiring connection to	NGET have chosen to develop and commission a new 400kV substation to serve the Botley West solar farm and other renewable generation developments emerging nearby. The location is assumed to be within the Applicants Order Limits within	

		the network, and/or • system capacity and resilience requirements determined by the Electricity System Operator.'	its Southern Site area. The Applicant is aware however, that NGET is also pursuing the possibility of securing consent for its new substation on land immediately to the west of the Applicants Southern Site. or possibly immediately to the west, both being in close proximity of the existing 400kV overhead line. The approach to assessment of the NGET substation is set out in Chapter 6 of the ES. In the event that NGET delivered on land to the west, the Applicant has assessed that scenario cumulatively. Siting of the NGET substation was influential in the selection of the Project Site.
2.2.3	'These twin constraints, coupled with the government's legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries[7] and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date.'	This is noted and understood by the Applicant.	
2.2.4	'However, a strategic and holistic approach to onshore and offshore network planning, as set out in paragraphs 2.7 – 2.8, will identify the most efficient way of meeting decarbonisation targets and should reduce the overall amount of network infrastructure required.'	This is noted by the Applicant, but the NGET 400kV substation is CNP infrastructure and is vital to deliver the Botley West Project as well as other energy generating and storage scheme nearby.	
2.2.5	'Additionally, applicants retain control in managing the identification of routing and site selection between the identified	The availability and provision of the new NGET substation was one of a number of factors that influenced the Applicants' site selection (see Chapter 5, Alternatives).	

	initiating and terminating points or within the development zone.'	The provision of the connecting electrical cables largely follow the public highway. There are four locations where alternative cable routes are possible and being evaluated (see Chapter 5 and 6 in the ES for details).
2.2.6	'Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in sections 2.4-2.9.'	The site selection and cable route choice and influences upon both are described in detail in Chapter 5 and 6 of the ES.
2.2.7	'The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.'	The site selection and cable route choice and influences upon both are described in detail in Chapter 5 and 6 of the ES.
2.2.8	'There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.'	The siting of the Applicants electrical infrastructure has sought to avoid or minimise any adverse effects, including from visual or from a noise perspective. Design of above ground infrastructure will be the subject of approval from the relevant local planning authority.
2.2.9	'In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)'	Relevant mitigation measures are described in the Mitigation and Commitments Schedule – Volume,3 Appendix 6.1 **[EN010147/APP/6.5]**.
2.2.10	'As well as having duties under Section 9 of the Electricity Act 1989, (in relation to	The Applicant has taken into account the duties associated with Schedule 9 of the Electricity Act 1989.

	developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.'"	
2.2.12	'Transmission and distribution licence holders are also required under Schedule 9 to the Electricity Act 1989 to produce and publish a statement setting out how they propose to perform this duty generally.'	The Applicant has produced a statement to address Schedule 9 of the Electricity Act 1989 **[EN010147/APP/1.1]**.
Climate Change Adaption and Resilience		
2.3.2	'As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be	Climate change effects are assessed with the Climate Change Chapter no.14 within the ES. **[EN010147/APP/6.3]**.

	vulnerable, and, as appropriate, how it has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively.'	
2.33	'Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see	Climate change effects are assessed with the Climate Change Chapter no.14 within the ES. **[EN010147/APP/6.3]**.

	Sections 5.8 in EN-1). Consideration should also be given to coastal change (see sections 5.6 in EN1).'	
Consideration of good design for energy infrastructure		
2.4.3	'However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.'	Subject to safety and engineering requirements, the design of above ground electrical infrastructure will be the subject of detail approval by the relevant planning authority via Requirements in the DCO.
2.4.4.	'While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Sections 2.9 below) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.'	Noted. See Applicant response to 2.4.3 above.
Environmental and Biodiversity Net Gain		
2.5.1	'When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:	The Applicant has achieved significant BNG (refer to oLEMP and BNG Report at **[EN010147/APP/7.6.3]** and Volume 3, Appendix 9.13 **[EN010147/APP/6.5]**, and is able to deliver other benefits including increased public access to the site (refer to Landscape, Ecology and Amenities Plan, **[EN010147/APP/7.3.3]**).

	i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.'	
Land Rights and Land Interests		
2.6.1	'In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must: i. own the land on, over, or under which the relevant activity is to take place; or ii. hold sufficient rights over or interests in that land (typically in the form of an easement); or iii. have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave).'	Land ownership and rights are reported within the Book of reference **[EN010147/APP/4.3]**
2.6.2	'Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work.'	Voluntary agreements have been sought throughout the Project area. For details on see Book of reference **[EN010147/APP/4.3]** and Land and Rights Negotiations Tracker **[EN010147/APP/3.6]**
2.6.3	'As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application	Voluntary agreements have been sought throughout the Project area. For details on see Book of reference **[EN010147/APP/4.3]** and Land and Rights Negotiations

	to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO.'	Tracker **[EN010147/APP/3.6].** Compulsory powers sought are set out in the draft DCO **[EN010147/APP/3.1]**
2.6.5	'The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.'	The compulsory powers sought are set out in the draft DCO **[EN010147/APP/3.1]**
2.6.6	As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance	The compulsory powers sought are set out in the draft DCO **[EN010147/APP/3.1]**
Applicant Assessment		
Biodiversity and Geological Conservation		
2.9.3	'Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even	No overhead lines are proposed by the Applicant. The NGET substation has been deliberately sited close to the existing 400kV line to reduce costs of connection to the national grid network and limit any adverse visual or other effects that might otherwise arise if the overhead connection was required.

	perching birds can be killed as soon as their wings touch energised parts of the infrastructure.'	
2.9.6	'Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the 'national site network' provisions of the Conservation of Habitats and Species Regulations.'	The Applicant has considered impacts upon feeding and hunting grounds, migration corridors and breeding grounds where relevant within Chapter 9 of the ES. **[EN010147/APP/6.3]**
Landscape and Visual Impact		
2.9.7	'While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.'	See response to paragraph 2.9.3 above. No overhead lines are proposed by the Applicant. The landscape and visual effects of the substations and other development are assessed with Chapter 8 in the ES. **[EN010147/APP/6.3]**
2.9.8	'These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed.'	See Applicants response to paragraph 2.9.7 above.
2.9.9	'New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network	See Applicants response to paragraph 2.9.7 above.

	may also give rise to adverse landscape and visual impacts.'	
2.9.10	'Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.'	See Applicants response to paragraph 2.9.7 above.
2.9.11	'Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines.'	See Applicants response to paragraph 2.9.7 above.
2.9.12	'However, in nationally designated landscapes (for instance, National Parks, The Broads and Areas of Outstanding Natural Beauty) even residual impacts may well make an overhead line proposal unacceptable in planning terms. (See Section 2.9.20 below for guidance on this case.)'	The Project is not located within any nationally designated landscape.
2.9.13	'Where possible, applicants should ensure that the principles detailed in Sections 2.11.16-2.11.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also	See Applicants response to paragraph 2.9.7 above.

	offer proposals (for instance those detailed in Section 2.10 below) for additional mitigation.'	
Undergrounding and subsea cables		
2.9.20	'Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty).'	Noted. All cables are laid underground or, in limited areas, on the surface where significant archaeology has been identified. As a result no significant adverse visual or other environmental effects are predicted.
2.9.21	'In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by re-routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line.'	See Applicants response to paragraph 2.9.20.
2.9.22	'However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to	See Applicants response to paragraph 2.9.20.

	minimise the adverse effects of the scheme.'	
2.9.23	'Additionally, cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling.'	See Applicants response to paragraph 2.9.20.
2.9.24	'In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against: • the adverse implications of the overhead line proposal; • the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and • the cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity	Noted. See Applicants response to paragraph 2.9.20.

	networks infrastructure.'	
2.9.25	In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider: • the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and	Noted. See Applicants response to paragraph 2.9.20.

areas), noting the policy in EN-1 section 5.4.53 on regional and local designations;

- the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating;
- the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating);
- the potentially very disruptive effects of

subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment;

- the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land

	and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.'	
2.9.25	In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider:	Noted. See Applicants response to paragraph 2.9.20.

- the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 section 5.4.53 on regional and local designations;
- the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating;
- the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating);
- the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional

	disruption to coastal communities and the environment; • the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.'	
	Noise and Vibration	
2.9.26	'All high voltage transmission lines have the potential to generate noise under certain conditions.'	Noise and vibration are assessed where relevant within the Chapter 13, Noise and Vibration. No significant adverse effects are predicted to arise. Mitigation measures are set out within the Mitigation and Commitments schedule – Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**
2.9.27	'Line noise is most commonly caused by corona noise when the conductor surface electric stress exceeds the inception level for corona discharge activity which is released as acoustic energy and radiates into the air as sound. Transmission line conductors are normally designed to operate below this threshold.'	See Applicant response to paragraph 2.9.26 above. .
2.9.28	'Surface contamination on a conductor or accidental damage during transport or installation can cause local enhancement of electric stress and initiate discharge activity leading to the generation of additional noise.'	See Applicant response to paragraph 2.9.26 above.
2.9.34	'Transmission line audible noise is generally categorised as 'crackle' or 'hum', according to its tonal content.'	See Applicant response to paragraph 2.9.26 above.
2.9.37	'Audible noise effects can also arise from substation equipment such as	See Applicant response to paragraph 2.9.26 above.

	transformers, quadrature boosters and mechanically switched capacitors.'		
2.9.38	'Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).'	See Applicant response to paragraph 2.9.26 above.	
2.9.39	'For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards[25] are satisfactory.'	See Applicant response to paragraph 2.9.26 above.	
2.9.40	"For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors.'	See Applicant response to paragraph 2.9.26 above.	
	Electric and Magnetic Fields (EMFs)		
2.9.44 to 2.9.58	Health effects of EMF's'		Chapter 16: Human Health in Volume 1 of the ES **[EN010147/APP/6.3]** considers public understanding of EMF exposure in terms of mental health outcomes associated with concern, acknowledging that actual risks are unlikely to be significant for public health (see section 16.9 of the Chapter).
	Sulphur Hexafluoride		
2.9.59	'Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.'		Noted
2.9.60	'It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050.'		Noted
2.9.61	'Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.'		The Applicant will seek to avoid the use of SF6-reliant assets.
	Secretary of State decision making		
	Impacts Biodiversity and Geological conservation		

2.11.1	'Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately.'	The Applicant has assessed the effects upon flora and fauna arising from electrical infrastructure within Chapter 9, Ecology. **[EN010147/APP/6.3]** No significant adverse effects are predicted to arise.
	Landscape and Visual	
2.11.2	'The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them.'	No Overhead lines are proposed. The Applicant has assessed the landscape and visual effects arising from electrical infrastructure within Chapter 8, Landscape and Visual Effects. **[EN010147/APP/6.3]** No significant adverse effects are predicted to arise.
2.11.3	'The Secretary of State should also be satisfied that all feasible options for mitigation – including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately.'	Noted. No Overhead lines are proposed. The Applicant has refined the layout and design of the Project to avoid or minimise adverse environmental effects. This approach is described in Chapter 5 in the ES, in the Layout and Design Principles document **[EN010147/APP/7.7]**, and the Mitigations and Commitments Schedule – Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**.
2.11.4	'In circumstances where it can be demonstrated that a mitigation measure and/ or technological approach is appropriate and/ or necessary for a project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making.'	See Applicant response to paragraph 2.11.3 above.
2.11.5	'Nationally designated landscapes have specific statutory purposes which help ensure their continued protection. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding.'	The Project does not fall within and nationally designated landscapes.
	Noise and vibration	
2.11.7	'The Secretary of State should ensure that appropriate assessment methodologies	Noted. Noise effects have been assessed within

	have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant.'	Chapter 13 in the ES. **[EN010147/APP/6.3]** Mitigation measures are set out within the Mitigation and Commitments Schedule Volume 3, Appendix 6.1 **[EN010147/APP/6.5]**. No significant effects are predicted to arise.
2.11.8	Consequently, noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable'	See Applicant response to paragraph 2.11.7 above.
	Electric and Magnetic Fields (EMFs)	
2.11.9	'This NPS does not repeat the detail of the ICNIRP 1998 guidelines on restrictions or reference levels. The government has developed with the electricity industry a Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice', published in February 2011 that specifies the evidence acceptable to show compliance with ICNIRP 1998 guidelines and is also in line with the terms of the 1999 EU Council Recommendation on EMF exposure.'	Chapter 16: Human Health in Volume 1 of the ES [EN010147/APP/6.3] considers public understanding of EMF exposure in terms of mental health outcomes associated with concern, acknowledging that actual risks are unlikely to be significant for public health (see section 16.9 of the Chapter).
	Sulphur Hexafluoride	
2.11.17	'The Secretary of State should grant consent for an electricity networks development only if the applicant has demonstrated either: i. that the development will not use SF6; or ii. (a) that there is no proven commercially available alternative to the use of SF6; and (b) that a bespoke SF6-free alternative would be grossly disproportionate in terms of cost; and (c) that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.'	The Applicant will consider the use of SF6 and SF6 free alternatives in the detailed design work.

Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy relevant policies and relevant 'saved' policies from the Minerals and Waste Local Plan (1996).

Policy	Description	Comment	Local Authority Comment
Policy M8 – Safeguarding Mineral Resources	Development preventing or hindering the possible future working of the mineral will not be permitted unless it can be shown that the site has been allocated, the need of the development outweighs the economic and sustainability consideration relating to the mineral resource or the mineral will be extracted prior to development. Within Mineral Consultation Areas, District Councils will consult the County Council on non-mineral development applications.	A Mineral Safeguarding Area for sharp sand and gravels has been identified within the Project area. In accordance with local planning policy a Mineral Resource Assessment (MRA) has been undertaken that demonstrates that although sand and gravel deposits of potential commercial interest are present sporadically beneath part of the Central Site area, the Project will not result in the permanent sterilisation of these resources. The MRA is presented as Chapter 11, Appendix 11.14 [**EN010147/APP/6.5**]. Notwithsatnding, the Applicant considers the Project to be substantially in accordance with Policy M8	
Policy C11 – Rights of Way	Seeks to maintain and retain the integrity and amenity value of the rights of way network shall be maintained. Diversions should be safe, attractive and convenient and, if temporary, shall be reinstated as soon as possible. If permanent diversions are required, these should seek to enhance and improve the public rights of way network. Improvements and enhancements are generally encouraged.	Chapter 17, Agriculture, Land Use and Public Rights of Way assess effects upon footpaths and bridleways. [**EN010147/APP/6.3**] It describes the temporary diversions necessary during construction and permanent diversions. The permanent diversions are limited in length and realign the statutory route to the existing 'desire line' of the right of way actually used by the public. Existing footpaths are protected, and most enhanced with new planting. New permissive paths are proposed.	

		No significant adverse effects are predicted. The Project accords with Policy C11.
Policy C12 – Green Belt	Proposals that constitute inappropriate development in the Green Belt, will not be will not be permitted except in Very Special Circumstances, which will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS (Appendix 8). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt, and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case. The Project does not conflict with Policy C12.

Appendix E
NPPF Compliance Table

NPPF 2023 paragraphs (As submitted November 2024)

Section/Paragraph Number	Description	Applicant Comment	Local Authority Comment
Section 2 – Achieving Sustainable Development			
Paragraph 10	Provides that for sustainable development to be pursued positively, at the heart of the NPPF, is a presumption in favour of sustainable development.	The Project has been designed and laid out, and is subject to a number of mitigation measures, which together deliver sustainable development. The Project successfully delivers a vital contribution to the Governments solar targets and Net Zero obligations, significant BNG, and will leave a significant and positive landscape and biodiversity legacy in the region for the long term (see the oCoCP and oOMP **[EN010147/APP/7.6.1 and 7.6.2]**, the oLEMP **[EN010147/APP/7.6.3]**, the Landscape, Ecology and Amenities Area plan **[EN010147/APP/7.3.3]** and the Mitigation and Commitments schedule **[EN010147/APP/6.5]**.	
Paragraph 11	Sets out the presumption in favour of sustainable development, which for decision-taking means: *"c) approving development proposals that accord with an up-to-date development plan without delay; or* *d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:* *i. the application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for*	Section 2 of this PSS sets out the decision making process the Secretary of State will follow in respect of NSIP's. The National Planning Policy Framework (NPPF) and the Planning Practice Guidance, for England, has been taken into account within the energy NPSs where appropriate (Paragraph 4.1.11) To the extent paragraph 11 is relevant, the Project accords with its provisions.	

	refusing the development proposed; or *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*	
Section 11 – Making effective use of land		
Paragraph 124	Identifies how planning policies and decisions should encourage multiple benefits from both urban and rural land and take opportunities to achieve net environmental gains such as developments that, amongst other things, would enable new habitat creation.	The Project has evolved in a way that positively balances the impacts associated with development at scale in countryside locations, with the very significant benefits the Project will bring. Importantly, the Project is regarded by Government as being a CNP, providing as it does a vital contribution to the delivery of the Governments solar targets ; making a positive contribution to its Net Zero obligations and its BNG goals, and also by helping to positively address the Climate Change Emergencies that the host authorities have declared.
Section 13 – Protecting Green Belt land		
Paragraph 142	Provides that the fundamental aim of Green Belt policy is to *"prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS (Appendix 8). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Paragraph 143	Provides the five purposes of a Green Belt, which are: " a. *The check the unrestricted sprawl of large built-up areas;*	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS Appendix 8). On balance the Project is supported by a VSC case that outweighs

	b. *To prevent neighbouring towns merging into one another;* c. *To assist in safeguarding the countryside from encroachment;* d. *To preserve the setting and special character of historic towns; and* e. *To assist in urban regenerations, by encouraging the recycling of derelict and other urban land."*	harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Paragraph 152	Details that *"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."*	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Paragraph 153	Highlights that local planning authorities, when considering a planning application, should ensure that *"substantial weight is given to any harm to the Green Belt."* It continues that *"Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."*	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Paragraph 154	Details that where development in the Green Belt is not considered inappropriate development, which range from, inter alia, agricultural buildings, provision for outdoor sport	The Applicant considers that the provision of electrical cables and related works (see Appendix 8 for details in this PSS) comprise engineering operations

	and creation to limiting infilling in villages.	directly associated with the Project is not inappropriate development in Green Belt terms.
Paragraph 155	The forms of development detailed are also not considered to be inappropriate development in the Green Belt, providing they preserve its openness and do not conflict with the purposes of including land within the Green Belt, including engineering operations.	The Applicant considers that the provision of electrical cables and related works (see Appendix 8 for details in this PSS) comprise engineering operations directly associated with the Project is not inappropriate development in Green Belt terms. The wider VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Paragraph 156	In specific relation to renewable energy developments; *"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 Applicant's VSC case supports the project being allowed in this location. Details of the Green Belt assessment are set out in Appendix 8 of this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.
Section 14 – Meeting the challenge of climate change, flooding and coastal change		
Paragraph 157	States *"The planning system should support the transition to a low carbon future in a changing climate … It should help to: shapes places in ways that*	Climate Change effects are set out within Chapter 14 of the ES. Significant beneficial effects from the Botley West Solar Farm are predicted.

	contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; and support renewable and low carbon energy and associated infrastructure."	The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.
Paragraph 160	Seeks to help increase the supply of renewable and low carbon energy and heat through the plan-making process via positive strategies which maximise the potential for suitable development, future re-powering and life extension, whilst ensuring adverse impacts are addressed, including cumulative landscape and visual impacts.	Whilst the host authorities have not expressly allocated land for renewable energy development, all have policies which support in principle renewable energy development. The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.
Paragraph 163	Does not require applicants to demonstrate the overall need for renewable or low carbon energy, in planning applications, and for local planning authorities to approve applications where its impacts are, or can be made, acceptable.	The Applicant notes and welcomes the position on need.