



Application by Photovolt Development Partners on behalf of Solar Five Limited for an Order Granting Development Consent for the Botley West Solar Farm

The Examining Authority's first written questions and requests for information (ExQ1)

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This document sets out the Examining Authority's (ExA) First Written Questions and requests for information (ExQ1), in order to facilitate the conduct of the Examination. Responses are due by **Deadline 2, Tuesday 1 July 2025**.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues in the Rule 6 letter, Annex C [PD-006]. The questions relate to issues as they have arisen during the Examination through the review of application material, written submissions, site inspections and Hearings.

Column 1 sets out the unique reference number to each question which starts with 'Q1' (indicating that it is from ExQ1), followed by an issue number, a sub-heading number and a question number. When you are answering a question, please start your answer by quoting the unique reference number.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. Please provide a substantive response to the questions directed at you or indicate why the question is not relevant to you. You may also respond to questions that are not directed at you, should the question be relevant to your interests.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact botleywestsolar@planninginspectorate.gov.uk and include 'Botley West Solar Farm Project' in the subject line of your email.

Responses are due by Deadline 2, Tuesday 1 July 2025.



List of abbreviations

AADT	Average Annual Daily Traffic	EA	Environment Agency
ALC	Agricultural Land Classification	EIA	Environmental Impact Assessment
AONB	Area of Outstanding Natural Beauty	EM	Explanatory Memorandum
AP	Affected Persons	ES	Environmental Statement
BESS	Battery Energy Storage System	ExA	Examining Authority
BMV	Best and Most Versatile	FRA	Flood Risk Assessment
BNG	Biodiversity Net Gain	FTE	Full Time Equivalent
BoR	Book of Reference	Gd	Grade
CA	Compulsory Acquisition	GHG	Greenhouse Gas Emissions
CA Guidance	Planning Act 2008: guidance related to procedures for the compulsory acquisition of land	GVA	Gross Value Added
CA Regulations	The Infrastructure Planning (Compulsory Acquisition) Regulations 2010	Ha	hectares
CoCP	Code of construction practice	HIA	Heritage Impact Assessment
CROW	The Countryside and Rights of Way Act	HDD	Horizontal Directional Drilling
dB	Decibel	HGV	Heavy Goods Vehicles
dDCO	Draft Development Consent Order	HRA	Habitats Regulation Assessment
DBA	Desk-Based Assessment	IAQM	Institute of Air Quality Management
DL	Deadline	IP	Interested Parties
		ISH	Issue Specific Hearing



km	Kilometre	OCTMP	Outline Construction Traffic Management Plan
kV	Kilovolt	OFH	Open Floor Hearing
LA	Local Authority	OLDP	Outline Layout and Design Principles
LIR	Local Impact Report	OLEMP	Outline Landscape and Ecology Management Plan
LLFA	Lead Local Flood Authority	OOMP	Outline Operational Management Plan
LRN	Local Road Network	OSEP	Outline Skills and Employment Plan
LSE	Likely Significant Effects	OSMP	Outline Soil Management Plan
LVIA	Landscape and Visual Impact Assessment	OUV	Outstanding Universal Value
m	Metre	OWSI	Outline Written Scheme of Investigation
MRA	Mineral Resource Assessment	PA2008	The Planning Act 2008
MW	Megawatt	PC	Parish Council
NE	Natural England	PEIR	Preliminary Environmental Information Report
NGET	National Grid Electricity Transmission Plc	Project webpage	Project webpage of the National Infrastructure Planning website
NH	National Highways	PRoW	Public Rights of Way
NHLE	National Heritage List England	R	Requirement in the dDCO
NPA2017	Neighbourhood Planning Act 2017	RAF	Royal Air Force
NPPF	National Planning Policy Framework	RR	Relevant Representation
NPS	National Policy Statement	RVAA	Residential Visual Amenity Assessment
NPS EN	National Policy Statement Energy Suite	s	Section of Parliamentary Legislation
NSIP	Nationally Significant Infrastructure Project	SAC	Special Area of Conservation



SF6	Sulphur Hexafluoride	SU	Statutory Undertaker
SM	Scheduled Monument	SuDS	Sustainable Urban Drainage Systems
SOCG	Statement of Common Ground	tCO2e	Tonnes of Carbon Dioxide Equivalent
SoR	Statement of Reasons	TP	Temporary Possession
SoS	Secretary of State	USI	Unaccompanied Site Inspection
SPA	Special Protection Area	WFD	Water Framework Directive
SRN	Strategic Road Network	WHS	World Heritage Site
SSSI	Site of Special Scientific Interest		

Examination Library

References in these questions set out in square brackets (e.g. [APP-010]) are to documents catalogued in the [Examination Library](#). The Examination Library will be updated regularly as the Examination progresses.



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Q1.1. General and Cross-topic Questions		
Planning Policy		
1.1.1	Applicant	National Planning Policy Framework (NPPF) Since the submission of the application, the NPPF has been updated. Please provide an updated assessment of the proposed development against the most recent version of the NPPF.
1.1.2	Applicant All Local Authorities Oxford Aviation Services Limited Civil Aviation Authority	The National Policy Statement for Airports Given the proximity of Oxford Airport and the services offered therefrom, comment on whether the National Policy Statement for Airports has any important and relevant matters for this Examination, and/ or for the Secretary of State (SoS) to be mindful of.
1.1.3	All local authorities	Local Plans Has the Applicant adequately included and summarised all relevant local planning policies? If not, why not?
1.1.4	Applicant	Oxford and Cambridge Growth Corridor Relevant Representations (RRs) have raised the issue about prejudicing growth between Oxford and Cambridge. What does the Applicant know about the Oxford to Cambridge growth corridor and how do decisions regarding that initiative impact upon the delivery (or other aspects) of the proposed development?
Planning Permissions		
1.1.5	All local authorities	List of cumulative projects The Applicant considered a long list of projects when assessing cumulative effects. Are there any updates or comments regarding any of those applications identified, or have any new applications come to light that are significant enough to require consideration cumulatively with the Proposed Development?

Deadline for responses is Deadline 2, 1 July 2025

Legislative Framework		
1.1.6	Applicant All local authorities Cotswold National Landscape Board	Section 85 of the Countryside and Rights of Way Act (CROW) Would the proposed development have any impact, beneficial or adverse, upon the purposes of the Cotswolds National Landscape (Area of Outstanding Natural Beauty) or represent an impediment to the relevant authority's duties to further those purposes set out in s85 of the CROW?
Design		
1.1.7	Applicant	Number of Piles and Worst-Case Design Scenario The ExA appreciates that the number of panels likely to be installed is not yet finalised and that this number would ultimately impact the total number of piles. However, it would help the Examining Authority's (ExA's) understanding if the Applicant could provide a plan detailing the number of piles for various design scenarios. The plan should also detail other factors which may have an environmental impact such as pile depth. Following on from this plan, for the Environment Statement (ES) chapters where piling is considered to have a potential impact, the Applicant should provide an explanation on which design option they have chosen to represent the worst case.
1.1.8	Applicant	Design Guides Provide a list of all the relevant national and local design guides that are applicable to the proposed development and/ or active within the local authority areas. Set out clearly how the design choices made so far, and the design choices in the future, in respect of all above ground elements of the infrastructure would accord with the principles of good design set out in each of these documents.
1.1.9	Applicant	Design choices and functionality The ExA noted, during the series of unaccompanied site inspections (USI), that a fair proportion of the Order limits consisted of north facing slopes. In the southern site area in particular, these rises were quite pronounced. <ol style="list-style-type: none"> 1) Is it the Applicant's intentions to have solar arrays on these north facing slopes? 2) If so, explain how the solar panels would sit on the slopes given the stated commitment to have no part of the panels above 2.3 metres from ground level?

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		<p>3) In relation to 2) above, the ExA asks this because it would appear, due to the fall of the land, that (assuming panels are south or southwest facing), the back edge of the panel (being no higher than 2.3 metres) could result in a near flat-lying solar panel.</p> <p>4) Can the Applicant confirm (and subsequently signpost if this measure is secured in one of the management plans) that no earthworks would take place to reshape or reform the land to accommodate the solar panels.</p>
1.1.10	Applicant	<p>Outline Layout and Design Principles document (OLDP)</p> <p>The OLDP [APP-238] omits several details that the ExA request elaboration upon. These are:</p> <p>1) For the National Grid (NGET) substation, the main project substation, the six secondary substations and the 156 PCS units, there are no details of materials or finishes or colours to be applied. Whilst the ExA recognise that such elements may be utilitarian, explanation of the appearance of this infrastructure is requested and, where possible, incorporated within the OLDP.</p> <p>2) A significant amount of fencing is to be provided during the operational period. The OLDP does not provide any details as to the height, colour or finishes of the fencing and nor is there any rationalisation of the design choices being made in this regard. Explain with reasons and amendments to the OLDP accordingly.</p> <p>3) The OLDP gives optionality for the solar panels either being black, dark blue or grey modules. Explain the implications of these colour choices upon the landscape and upon how receptors perceive the panels.</p> <p>4) The OLDP was amended at Deadline 1 to include revised parameters for the National Grid substation, notably that the height is now 14 metres as opposed to 12 metres. Explain how this height increase is assessed in the ES, if at all.</p>
1.1.11	Applicant	<p>Minimising glint and glare through design</p> <p>What design features would the solar panels have to ensure potential impacts due to glint and glare are at an absolute minimum?</p>
1.1.12	All local authorities	<p>Independent Design Review</p> <p>Do you consider that the draft Development Consent Order (dDCO) should make a provision for the final design of the proposed development to be subject to an independent design review?</p>

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1.1.13	Applicant	<p>Air or Gas Insulated</p> <p>The planning statement [APP-225, paragraph 3.3.67] makes a commitment to secure switchgear that is not insulated with Sulphur Hexafluoride, SF6.</p> <ol style="list-style-type: none"> 1) The commitment appears to apply to the National Grid substation only. Why is that the case? 2) The commitment does not appear in the OLDP or any other document binding the Applicant or any successors in implementing. Explain with reasons. 3) National Grid, particularly if providing their substation outside of the Order limits, would not be bound by this commitment. How can the Applicant state with any certainty that SF6 free development would occur and how does this apparent oversight affect the conclusions in respect of greenhouse gas emissions?
1.1.14	Applicant	<p>Design Principles</p> <p>Section 4.6 of NPS EN-1 emphasises the importance of ensuring good design in the development of Nationally Significant Infrastructure Projects, referring also to the 'Design Principles for National Infrastructure developed by the National Infrastructure Commission. The NPPF also advocates good design.</p> <p>Set out the approach taken to good design, and how this element of the Proposed Development has evolved in relation to the following key elements. This should include reference how each element has responded, in terms of form and siting, to functional and aesthetic requirements, including sensitivity to existing landscape character and nature inclusivity. Reference should be made to how emerging technology can or could be accommodated. Please include details for:</p> <ul style="list-style-type: none"> • Solar panels and associated equipment. • On-site substations and associated equipment and structures. • Boundary Treatments. • Hard and soft landscaping
1.1.15	Applicant	<p>Cable burial</p> <p>The ExA have read in the Deadline 1 (DL1) submissions that the cables would be buried a minimum of 1.5 metres (m) beneath ground level. Where is this secured and what would happen if obstacles prevented that burial depth being achieved?</p>

Miscellaneous		
1.1.16	Applicant	<p>Decommissioning - general</p> <p>Requirement 14 (1) states that decommissioning will commence no later than 37.5 years following the date of final commissioning.</p> <ol style="list-style-type: none"> 1) If the final commissioning of the project is delayed, would this mean that the lifetime for parts of the project could be substantially longer than 37.5 years? 2) What is the maximum lifetime for any part of the project? 3) How long would decommissioning take? How is this timescale secured? 4) What assurances can the applicant provide that adequate funding would remain available after the operational life of the project has come to an end, to restore the site to an agreed and adequate standard? 5) Although the Applicant stated it was not necessary to include a requirement securing decommissioning bonds, the ExA would request the Applicant provide, on a without prejudice basis, text for such a requirement.
1.1.17	Applicant	<p>Decommissioning – piles and soil stability</p> <p>During Open Floor Hearing 1 (OFH1) and Issue Specific Hearing 1 (ISH1) the number and type of piles were discussed, and also that it is proposed that these would generally be left in the ground after decommissioning.</p> <p>What assessments have been made into the safety of doing this, particularly in relation to the leaching of heavy metals or other contaminants into the soil, which is then proposed for a return to agricultural use?</p>
1.1.18	Applicant	<p>Replacement of Panels</p> <p>During the OFH's and ISH1, the probability of replacing the panels throughout the life of the project was discussed; probably at around 25 years.</p> <p>At this time:</p> <ol style="list-style-type: none"> 1) Will the frames also require replacement? 2) What guarantees are there that the frames/ panels will be the same size as those being replaced?

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		<p>3) If there are no guarantees, would this mean that there may be a need for additional piling to be carried out at this time?</p> <p>4) If the output of the solar farm is restricted to 840MW as per the connection agreement, using more efficient or more productive panels would result in waste. Would the connection agreement have to be reviewed or revised as part of the operational phase planned maintenance?</p> <p>5) Alternatively, would there be a reduction in number of panels in order to limit the output?</p>
1.1.19		<p>Solar Panel Mounting Mechanism</p> <p>In ES Chapter 6 [APP-043] paragraph 6.4.10 describes the solar module mounting structure as being a metal framework, supported by galvanised steel piles or screws, with a worst-case assumption of two legs at each end.</p> <p>To understand the likely number and distribution of piles and the orientation of these panels in differing gradients, provide an indication of how many individual solar panels will fit onto one section of framework, accompanied by scaled elevations, sections and plans that describe a typical block of panels on varying land gradients.</p>
1.1.20	Applicant	<p>Statement of Commonality – Agricultural land use</p> <p>The Statement of Commonality submitted at Deadline 1 (DL1) states that issues in relation to agricultural land use as being ‘matter not relevant’ regarding all relevant local authorities. However, in the submitted Statements of Common Ground (SoCG) at DL1, agricultural land use is a matter under discussion which is yet to be agreed. Clearly, the Local Impact Reports specify that agricultural land use is an issue.</p> <p>Please explain the variation between the two documents.</p>
1.1.21	Applicant and local authorities	<p>Statement of Common Ground – content</p> <p>Please provide a justification as to why matters relating to socio-economics and health are not included within the draft SoCG submitted at DL1?</p>

Q1.2. Air Quality and Emissions		
Air Quality Management		
1.2.1	Applicant	<p>Institute of Air Quality Management (IAQM) assurance measures implemented by other developers</p> <p>In para 19.10.3 [APP-056] it states, '<i>on the basis that other proposed developments implement suitable primary and tertiary mitigation, as recommended in the Guidance on the assessment of dust from demolition and construction (IAQM, 2024), it is considered that cumulative effects arising during construction are not significant</i>'.</p> <p>What measures will the applicant take to assure residents that, due to other developers implementing the required measures listed in IAQM 2024, cumulative impacts would not be significant?</p>
1.2.2	Applicant	<p>Screening out of operational activities</p> <p>ES Chapter 19 [APP-056] screens out operational and maintenance traffic emissions and fugitive emissions. However, with the solar panels having a usable life of 25 years requiring each panel to be replaced at least once during the 37.5-year lifetime of the proposed development, why have such activities been screened out?</p>
Impacts on human health		
1.2.3	Applicant	<p>Cumulative impacts due to construction overlap</p> <p>Table 12.33 of ES Chapter 12 [APP-049] lists the project 'Land North of Banbury 21/00217/OUT' as being under construction in 2026 and therefore construction overlap with Botley West is assumed. However, in Table 19.43 of ES Chapter 19 [APP-056], it states that the date of construction is unknown and therefore it is not known whether construction overlap will occur or not. Can you confirm which table is correct and whether cumulative impacts from such projects have been considered?</p>
1.2.4	Applicant	<p>Fire or damage</p> <p>If the solar panels, or indeed any part of the proposed development, caught fire or was damaged, what pollutants or compounds could be released into the air and what would the impact of this pollution be upon human health given the proximity of the population?</p>

Q1.3. Assessment of Alternatives		
Strategic Alternatives		
1.3.1	Applicant	<p>Substation search</p> <p>In ISH1, the Applicant sought to explain the reasons why Cowley had been chosen as the preferred substation for connection. It was then described that, since Cowley was ‘landlocked’ by Thames Water land, a connection point was established further west along the pylon route towards Cowley.</p> <p>When the choice was then made to develop a brand-new substation (in this instance, west of Cowley) as per paragraph 5.6.13 [APP-042], there appears no further consideration of whether an alternative site under the overhead lines, but outside the Green Belt, was ever considered. What is not clear is, when the only pre-requisite of constructing the new substation was proximity to the overhead lines, not proximity to Cowley, why was a substation not considered on land outside the Green Belt?</p>
1.3.2	Applicant	<p>Substation search and underlying choices</p> <p>Paragraph 5.6.4 in ES Chapter 5 [APP-042] sets out the criteria used to guide the project. Curiously, after the suitability of a grid connection, your next main listed influence is voluntary landowner negotiations (not irradiance as per NPS EN-3). Your decision to go with Cowley is explained briefly in 5.6.8, most notably with the statement that there were landowners who were willing to offer land to build a solar farm.</p> <p>At paragraph 5.6.14 you state discussions with Blenheim Palace started in February 2020. By the tone of paragraph 5.6.8, it appears those negotiations started before you began your process of considering alternatives, giving the impression of the agreement with the Blenheim Estate being the principal driver.</p> <p>Could you provide a chronology, and reassurances, to the ExA to demonstrate that the assessment of alternatives was undertaken holistically?</p>
1.3.3	Applicant	<p>Grampian-style requirement</p> <p>In ISH1, it was said that a Grampian requirement, preventing works on the proposed development commencing and/ or the using of compulsory acquisition powers unless and until the National Grid substation was approved, was not necessary.</p>

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		<p>National Grid have suggested that an application for their substation under the Town and Country Planning Act regime would possibly be made in 2026. No exact timetable is provided and, with the prospect of appeals or judicial reviews as a potential delaying factor, the likelihood of the National Grid substation being constructed fully and ready to receive the proposed development is in doubt.</p> <p>The ExA remain concerned and therefore request that the Applicant provide, on a without prejudice basis, wording of such a requirement.</p>
1.3.4	Applicant	<p>Reductions</p> <p>In Table 5.2 of ES Chapter 5 [APP-042], the Applicant dismisses the idea of Bladon Parish Council to consider the alternative of a reduced size solar farm, stating there is no policy limitation on scale. Whilst this is acknowledged, the ExA anticipate there may be sensitive areas, for example near Blenheim Palace or near Oxford Airport, where concessions could have been considered to the size of the solar farm in order to mitigate against potential effects. Why were these reductions not considered?</p>
1.3.5	Applicant National Grid Electricity Transmission	<p>Battery Energy Storage System (BESS)</p> <p>In paragraph 6.4.3 of ES Chapter 6, it states that: "<i>the Project does not incorporate any battery storage. Energy generated by the Project will be stored, as required, by Battery Energy Storage Systems (BESS) that are connected to the Grid elsewhere, including the EDF 50MW BESS located at Cowley substation.</i>"</p> <p>Questions are as follows –</p> <ol style="list-style-type: none"> 1) How much influence in the optioneering process did the availability of battery storage play in the site selection process? 2) Is there equivalent, or better, battery storage at any of the other 18 existing national grid substations reviewed in the ES? 3) The nearest BESS is located at the nearest National Grid substation. As a new substation would be provided in conjunction with the Project, would new BESS, either within or just outside the Order limits be expected? 4) What equipment/ apparatus would constitute a new National Grid substation, and should this list be written into the dDCO? 5) Would National Grid be responsible for developing any battery storage required to meet the potential demand arising from this Project?

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		6) If BESS is provided elsewhere 'including' the Cowley substation, what other destinations are anticipated to be used for electricity storage?
Project Alternatives		
1.3.6	Applicant National Grid Electricity Transmission Plc	<p>National Grid substation</p> <p>If the new National Grid substation is being provided outside the Order limits, the Applicant has no control over the timing of submission of a planning application nor any control over the construction of the substation.</p> <ol style="list-style-type: none"> 1) What assurances can the ExA have that the National Grid substation would actually be constructed in time for the connection agreement in October 2028 to be honoured? 2) It is understood National Grid are seeking to submit an application in 2026. Please provide a more detailed timetable from submission through to construction and to completion.
1.3.7	Applicant	<p>Other substations and PCS units</p> <p>The ES reports that there would be 6no. Secondary substations within the Proposed Development as well as up to 156 PCS units. There is no detail in ES Chapter 5 [APP-042] regarding what criteria or thought processes were applied to locating or developing this infrastructure, or the factors taken into account when determining effects upon receptors (noise, landscape, living conditions etc). Provide the necessary information.</p>
1.3.8	Applicant	<p>Substations versus Best and Most Versatile Agricultural Land (BMV)</p> <p>In paragraph 3.3.86 of the planning statement [APP-225], the Applicant states the majority of the BMV land lost to the proposed development is because of the construction of the National Grid substation. With National Grid looking to locate the substation outside of the Order limits, it would be logical that the BMV land would then not be lost. However, the Applicant is proposing to extend the solar farm on top of the area that would have been occupied by the National Grid substation.</p> <ol style="list-style-type: none"> 1) On that 3.8 hectares of land vacated by the substation, how many panels could be placed and what energy yield would be realised from those additional panels? 2) A balancing exercise needs to be undertaken comparing and contrasting the benefits of that additional yield (as identified in question 1 above) versus the harmful loss of BMV. Provide the assessment and outcomes accordingly.

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1.3.9	Tim Palmer	<p>Yield from solar panels</p> <p>In your relevant representation [RR-1067], you refer to Perovskites PV Panels. Please explain what is known about these Perovskites PV panels.</p> <ol style="list-style-type: none"> 1) What is the comparative output? 2) Under the terms of the Order and the flexibility sought by the Applicant, do you consider there would be any impediment to the Applicant using the most up-to-date technology to enhance the electricity yield from the solar farm?
1.3.10	Applicant	<p>Flexibility of Order limits</p> <p>The dDCO, Works Plans and Land Plans allow for flexibility in cable routing options in a number of locations in the Order limits. These are further explained in paragraphs 3.12.4 and 3.12.5 in the Statement of Reasons.</p> <ol style="list-style-type: none"> 1) Is the Applicant any closer to narrowing down the scope of those options? 2) Is the Applicant likely to submit a change request any time soon seeking the removal of some optionality from the project?
1.3.11	Applicant	<p>Mineral and waste resources</p> <p>The ExA notes that, in respect of sensitive archaeology deposits, the Applicant has chosen to avoid or exclude the relevant land from Order limits, or to provide protective fencing around the relevant land, thus demonstrating a proactive choice for the location of the development. It does not appear that equal levels of consideration have been given to mineral safeguarding areas or waste disposal sites. This has attracted objections from Oxfordshire County Council as per the Local Impact Report. In light of this objection, notwithstanding the applicant will provide a separate response, the ExA requests detailed answers on the following:</p> <ol style="list-style-type: none"> 1) How large, in hectares, is the extent of the mineral safeguarding area impacted upon by the proposed development? 2) Why wasn't this land area, or at least more critical parts of this land area to any future mineral working, avoided when designing and locating the proposed development? 3) What options exist for underground cabling in proximity to the Hensington Railway cutting landfill site (and other old pits or quarries), and could these areas be avoided altogether from disturbance by careful micro-siting of the cable route?

General Considerations for Alternatives		
1.3.12	Applicant	Field margins In OFH1 the issue of buffer zones was raised, with dimensions ranging from 25 metres to 500 metres cited. Provide the rationale and scientific reasoning as to why you have chosen the buffer zones you have between solar panels and private residences and set out whether the greater distances requested by IPs would be disadvantageous to the project.
1.3.13	Applicant	Field reductions A number of IPs have submitted requests for the solar farm area to be reduced or panels to be removed from 'x' or 'y' field. It would be useful, for visualisation purposes, if these reductions (whether you consider them valid or not) could be shown illustratively on a plan. Provide this plan.
1.3.14	Applicant National Grid Electricity Transmissions	Farmoor Reservoir Provide, within as reasonable an estimate as possible, dimensions of the distances between the proposed new substations and the embankment for Farmoor Reservoir.

Q1.4. Climate Change		
Assessments and Calculations		
1.4.1	Applicant	Life cycle analysis When calculating the benefit in reducing greenhouse gas (GHG) emissions from the proposed development, can the applicant confirm whether or not they took into consideration the GHG emissions due to manufacture, transport and disposal of the solar panels, as part of a life cycle analysis assessment.
1.4.2	Applicant	Individual panel efficiency during operation What process and procedures will the applicant have to continually assess the performance of individual panels and then to ensure they are performing at the optimal level?
1.4.3	Applicant	Maintenance activities across the farms 1) Has the applicant considered rainwater harvesting systems in an attempt to reduce the potable water demand of the proposed development? 2) How will contaminated water generated through cleaning activities, be contained and disposed of?
1.4.4	Applicant	Recycling Strategy Does the applicant have a recycling plan for damaged and inefficient panels. If so, does this plan include containment and safe disposal of potentially harmful substances?
1.4.5	Applicant	Miscalculation In Table 14.16 [APP-051], should the figure for decommissioning be a '+' factor and not a '-' factor as shown? If the figure for GHG emissions is indeed '-' during decommissioning, provide a breakdown of how this figure was reached.
1.4.6	Applicant	Clarification on calculations In Table 14.11, in respect of operational emissions, do the figures include the emissions generated through the complete overhaul / replacement of solar arrays at the stage of 25 years into the 37.5-year life span?

Impacts of Climate Change		
1.4.7	Applicant	<p>Microclimate</p> <p>In both OFH1 and ISH1, Interested Parties (IPs) spoke about microclimates and their impacts (reflection or absorption of heat, air thermals, increased light, dryness, wind etc) on aviation safety and ancient woodland.</p> <p>Has the applicant assessed the potential creation of microclimates and their impact on the surroundings?</p> <p>If such an assessment has been carried out, provide justification and evidence of any conclusions reached.</p>

Q1.5. Compulsory Acquisition		
Overarching Case		
1.5.1	Applicant	<p>Compulsory Acquisition (CA) Schedule</p> <p>Please provide updates of the CA Schedule and the Land Rights Tracker concerning the position of ongoing negotiations for acquisition by agreement and include the total number of plots for which agreement has been reached. The Applicant is requested to provide regular updates throughout the Examination as the Examination Timetable.</p>
1.5.2	Applicant	<p>Compliance with Department for Communities and Local Government Guidance</p> <p>Please advise whether the Book of Reference (BoR) [AS-028] (updated at DL1) is fully compliant with Department for Communities and Local Government (DCLG) Guidance¹ (CA Guidance). If not, please amend as necessary.</p>
1.5.3	Applicant	<p>Diligent Enquiry into Land Interests</p> <p>The content of the Land Rights Tracker [AS-013] (updated at DL1) is noted by the ExA. In respect of unregistered land, set out what further steps you will be taking to investigate any unknown ownership and rights during the Examination?</p>
1.5.4	Applicant	<p>Diligent Enquiry into Land Interests</p> <p>Do you envisage any changes to the application which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010?</p>
1.5.5	Applicant	<p>Reasonable Alternatives to Compulsory Acquisition</p> <p>In the light of the CA Guidance, in particular paragraph 8:</p> <ol style="list-style-type: none"> 1) How the ExA can be assured that all reasonable alternatives to compulsory acquisition (CA) (including modifications to the scheme) have been explored? 2) Set out in summary form, with document references where appropriate, what assessment/ comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.

¹ Planning Act 2008, Guidance related to procedures for the compulsory acquisition of land, DCLG, September 2013

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1.5.6	Applicant	<p>Reasonable Alternatives to Compulsory Acquisition</p> <p>Paragraph 25 of the CA Guidance states that applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail.</p> <ol style="list-style-type: none"> 1) Please demonstrate the Applicant's compliance with this aspect of the CA Guidance. 2) Has the Applicant offered full access to alternative dispute resolution techniques for those with concerns about the CA of their land or considered other means of involving those affected?
1.5.7	Applicant	<p>Accuracy of the Book of Reference, Land Plans and Points of Clarification</p> <p>What assurance and evidence can the Applicant provide of the accuracy of the land interests identified as submitted? Indicate whether there are likely to be any changes to the land interests, including the identification of further owners/ interests or monitoring and update of changes in interests?</p>
1.5.8	Affected Persons IPs	<p>Accuracy of the Book of Reference, Land Plans and Points of Clarification</p> <p>Are any Affected Persons or IPs aware of any inaccuracies in the BoR [AS-028] (updated at DL1), Statement of Reasons (SoR) [APP-021] or Land Plans [AS-006]? If so, please set out what these are and provide the correct details.</p>
1.5.9	Applicant	<p>Scope and Purpose of Compulsory Acquisition Powers</p> <p>Section 5 of the SoR [APP-021] considers the source and scope of the powers set out in the dDCO [AS-009], (updated at DL1). It is stated that land within the Order Limits will be subject to a statutory authority to override easements and other rights, and to extinguish private rights of way upon the appropriation of the land for the purposes of the DCO.</p> <p>Please explain in further detail:</p> <ol style="list-style-type: none"> 1) The need to seek such a wide-ranging power and why all such rights and easements cannot be specifically identified. 2) Why it is necessary to include powers of CA as a means of overriding existing rights and interests in or over land, as well as creating new rights over land, and granting the right to take temporary possession (TP) of land? 3) The nature and extent of any delay to the project that might otherwise result.

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		4) What alternatives to this approach have been explored?
1.5.10	Applicant	<p>Scope and Purpose of Compulsory Acquisition Powers</p> <p>The SoR, section 3.12 [AS-015], states that the Order Limits have been defined to allow sufficient flexibility to enable the final detailed design of the Proposed Development to be optimal.</p> <p>For the avoidance of doubt, please set out and justify the extent of the flexibility that the submitted scheme would allow in terms of Limits of Works and parameters providing dimensions where relevant.</p> <p>How would it be ensured that powers of CA would not be exercised in respect of land not ultimately required as a result of the detailed design process?</p>
1.5.11	Applicant	<p>Whether a Compelling Case in the Public Interest Exists</p> <p>The SoR, sections 7 and 8 [AS-015], set out the Applicant's compelling case in the public interest for the proposed CA. Paragraphs 6.5 and 7.4.5 assert that the public benefits of the scheme would outweigh the adverse impacts on the interests of those who would be affected by the proposed use of CA powers.</p> <ol style="list-style-type: none"> 1) What assessment, if any, has been made of the effect upon individual Affected Persons and their private loss that would result from the exercise of CA powers in each case? 2) What is the clear evidence that the public benefit would outweigh the private loss and how has that balancing exercise between public benefit and private loss been carried out?
1.5.12	Applicant	<p>Whether a Compelling Case in the Public Interest Exists</p> <p>The SoR, section 8.4 and paragraphs 7.4.3 and 7.8.2 [AS-015], states that the Applicant has taken steps to engage with these persons through formal consultation to understand the direct and indirect impacts on them. Section 8.4 explains that the Applicant has engaged directly with individual landowners and those with an interest in the affected land.</p> <p>Please provide further details, with examples where available:</p> <ol style="list-style-type: none"> 1) How has such engagement helped to shape the proposals and enabled the Applicant to make changes to designs to minimise the private loss? 2) How has the direct engagement with individual landowners given the Applicant a better understanding of the direct and indirect impacts on them?

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		3) Please provide detail, where available, of the direct and indirect impacts thereby identified.
1.5.13	Applicant	<p>Whether a Compelling Case in the Public Interest Exists</p> <p>What weight has the Applicant attached to the compensation that would be available to those entitled to claim it under the relevant provisions of the National Compensation Code in its assessment of private loss?</p>
1.5.14	Applicant	<p>Justification for Interfering with Human Rights of those with an Interest in the Land Affected</p> <p>What degree of importance has been attributed to the existing uses of the land proposed to be acquired in assessing whether any interference would be justified, and why?</p>
1.5.15	Applicant	<p>Justification for Interfering with the Human Rights of those with an Interest in the Land Affected</p> <p>In relation to the Applicant's duties under section 149 of the Equalities Act 2010:</p> <ol style="list-style-type: none"> 1) Please explain how the Applicant has had regard to its public sector equality duty in relation to the powers of CA sought and where this can be identified within the Application. 2) Have any Affected Persons been identified as having protected characteristics?
1.5.16	Applicant	<p>Justification for Interfering with the Human Rights of those with an Interest in the Land Affected</p> <p>Paragraph 9.5 of the SoR [AS-015] states that SolarFive Ltd has considered the balance to be struck between individual rights and the wider public interest.</p> <p>Explain more precisely the factors which have been placed in the balance (including references to any paragraphs of any relevant National Policy Statement (NPS) and Government Guidance), the weight attributed to those factors and how this exercise has been undertaken?</p>
1.5.17	Applicant	<p>Justification for Interfering with the Human Rights of those with an Interest in the Land Affected</p> <p>Paragraph 9.4 of the SoR [AS-015] states that to the extent that the DCO would affect individuals' rights, the proposed interference with those rights would be in accordance with law, proportionate and justified in the public interest.</p>

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		<ol style="list-style-type: none"> 1) How has the proportionality test been undertaken? 2) Explain further the proportionate approach which has been taken in relation to each plot?
1.5.18	Applicant	<p>Scope and Purpose of the Compulsory Acquisition Powers</p> <p>The SoR, paragraph 5.9.3(g) [AS-015], states that Article 18 (authority to survey and investigate the land) would authorise SolarFive Ltd to enter onto any land within the Order limits or which may be affected by the authorised development (whether or not that land is within the Order limits) to undertake various survey and investigative works, including trial holes. Article 18(2) provides for a 14-day notice period to be given to the owner/ occupier of the land.</p> <p>Provide justification for a 14-day notice period and consider whether this is unreasonably short and should be extended to 28 days?</p>
1.5.19	Applicant	<p>Scope and Purpose of the Compulsory Acquisition Powers</p> <p>Paragraph 5.9.1 of the SoR [AS-015] explains that Article 22 (compulsory acquisition of rights) would allow SolarFive Ltd to compulsorily acquire existing and new rights, as well as impose restrictive covenants over land.</p> <ol style="list-style-type: none"> 1) Please provide an indication of the anticipated content and/ or an initial draft of any restrictive covenants intended to be imposed. 2) Should a requirement for consultation with relevant owners/ occupiers as regards the drafting of any such restrictive covenants be imposed?
1.5.20	All local authorities	<p>Scope and Purpose of the Compulsory Acquisition Powers</p> <p>Are you aware of:</p> <ol style="list-style-type: none"> 1) Any reasonable alternatives to CA or TP for land sought by the Applicant? 2) Any areas of land or rights that the Applicant is seeking the powers to acquire that you consider would not be needed? Please identify which plots these are and explain why you consider they would not need to be acquired.
1.5.21	Applicant	<p>Whether Adequate Funding is Available</p> <p>The CA Guidance, paragraph 17, considers the resource implication of the proposed development. In the light of that guidance and noting the detail within the funding statement [APP-022], please set out the degree to which other bodies (public or private sector) have</p>

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		agreed to make financial contributions or to underwrite the scheme, and the basis upon which any such contributions or underwriting is to be made.
1.5.22	Applicant	<p>Whether Adequate Funding is Available</p> <p>In the light of paragraph 18 of the CA Guidance, what evidence is there to demonstrate that adequate funding is likely to be available to enable the CA within the statutory period following any DCO being made?</p>
1.5.23	Applicant	<p>Whether Adequate Funding is Available</p> <p>Please summarise the evidence relied upon to support the conclusion that there is a reasonable prospect that the scheme, if granted consent, would actually be taken forward and in what time period?</p>
1.5.24	Applicant	<p>Whether Adequate Funding is Available</p> <p>The Funding Statement, section 5 [APP-022], states that an estimate of the amounts necessary to cover the payment of compensation associated with the exercise of any CA powers granted has been considered in the overall project cost.</p> <p>Paragraph 7.4 provides an estimate of the cost of land acquisition. Please explain further the nature of the expert advice taken in that respect and the basis for and reliability of this estimate?</p>
1.5.25	Applicant	<p>Funding and Corporate Structure</p> <p>In paragraph 4.8 [APP-022] it states £11 million has been given to Solar Five Limited as a shareholder loan. Why does this not appear on the balance sheets, which show the company made a substantive loss at the end of 2022?</p>
1.5.26	Applicant	<p>Funding and Corporate Structure</p> <p>Photovolt Development Partners (PVDP) at the end of 2022 indicated a retained profit of just over £1 million [APP-022]. The project cost is purported to be circa £820 million in paragraph 5.1 of the Funding Statement. It appears there is a significant absence of funds. Paragraph 6.1 of the Funding Statement [APP-022] appears to skim over this by saying the ability to procure financial resources exists.</p> <p>How does the Applicant explain this disparity and where is the significant investment due to come from?</p>

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1.5.27	Applicant	Funding and past activities Paragraph 4.5 of the Funding Statement [APP-022] suggests that, since 2009, PVDP has developed 980W across 20 solar projects worldwide. It is assumed that is meant to read MW (Megawatts). If that is indeed the case, this averages at 49MW per project. <ol style="list-style-type: none">1) Does the Applicant have any experience in the delivering or financing of a project the size and scale that is proposed here?2) Has the Applicant got demonstrable experience in raising the financing required for a project of the size proposed?3) If not, what reliability is there in the optimism that the finances required for the project will materialise?
1.5.28	Applicant	Funding and accounts Please provide annual financial statements dated 31 December 2023 (or 2024 if currently available), including balance sheets, for Photovolt Development Partners GmbH and SolarFive Ltd. Please provide unredacted and redacted versions.
1.5.29	Applicant	Funding Statement Paragraph 7.6 of the Funding Statement [APP-022] refers to Article 47, please review this reference and confirm whether the reference is correct.
1.5.30	Applicant	Photovolt UK Limited It is stated in paragraph 4.6 [APP-022] that Photovolt UK Ltd would facilitate development activities for the Project and other UK projects. <ol style="list-style-type: none">1) Where is this company registered?2) Provide the accounts for this business.
1.5.31	Applicant	Other Matters In the light of the CA Guidance, paragraph 19, please demonstrate: <ol style="list-style-type: none">1) How potential risks or impediments to implementation of the scheme have been properly managed.2) The account taken of any other physical and legal matters pertaining to the application including the programming of any necessary infrastructure accommodation works and

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		the need to obtain any operational and other consents applicable to this type of development.
1.5.32	Applicant	<p>Other Matters</p> <p>Section 11 of the SoR [AS-015] refers to the Consents and Licenses Required Under Other Legislation [APP-035] which identifies the other consents, licenses and agreements that are required for the proposed development to be implemented. Please indicate whether there are any changes to the status for each consent, licence and agreement listed within that schedule since the application was submitted.</p>
1.5.33	Applicant	<p>Neighbourhood Planning Act 2017</p> <p>Given the parliamentary approval to the temporary possession regime under the Neighbourhood Planning Act 2017 ('NPA 2017'), which was subject to consultation and debate before being enacted (and which, by virtue of article 6(1)(g), the applicant is seeking to disapply), should any provisions relating to notices/ counter notices which do not reflect the NPA 2017 proposed regime, not yet in force, be modified to more closely reflect the incoming statutory regime where possible?</p> <p>As examples:</p> <ol style="list-style-type: none"> 1) The notice period that will be required under the NPA 2017 Act is 3 months, substantially longer than the 14 and 28 days required under articles 29(3) and 30(3) respectively. Other than prior precedent, what is the justification for only requiring 14 days' and 28 days' notice in this case? 2) Under the NPA 2017, the notice would also have to state the period for which the acquiring authority is to take possession. Should such a requirement be included in this case? 3) Powers of temporary possession are sometimes said to be justified because they are in the interests of landowners, whose land would not then need to be acquired permanently. The NPA 2017 Act provisions include the ability to serve a counter-notice objecting to the proposed temporary possession so that the landowner would have the option to choose whether temporary possession or permanent acquisition was desirable. Should this article make some such provision – whether or not in the form in the NPA 2017?

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Statutory Undertakers		
1.5.34	Statutory Undertakers	<p>Acquisition of Statutory Undertakers' Land</p> <p>The SoR, paragraph 10.3.4 [AS-015], states that adequate protection for statutory undertakers will be included within protective provisions in the dDCO [AS-009] (updated at DL1). SolarFive Ltd therefore considers that statutory undertakers will not suffer serious detriment to the carrying on of the undertaking as a result of the CA of land or rights over land or powers of TP. For those statutory undertakers who have been sent the draft protective provisions but have not confirmed agreement, please explain for each one why these protective provisions are considered to provide adequate protection and why SolarFive Ltd considers that the land and rights can be acquired without serious detriment to the carrying on of the undertaking.</p>
1.5.35	Statutory Undertakers	<p>Planning Act 2008</p> <p>Set out your position with regards to the tests under s127 and s138 of PA2008 as applicable to your respective interests.</p>
1.5.36	Applicant	<p>Thames Water Utilities Limited</p> <p>Noting the content of the Thames Water Utilities (TWUL) DL1 submission, please confirm if an outline infrastructure drainage strategy has been submitted to TWUL.</p>
Individual Affected Persons		
1.5.37	Applicant	<p>Roderick William Cameron Cooke and Christine Mary Cooke</p> <p>Please review the 'Likelihood of resolution during the Examination' column in the Land and Rights Negotiations Tracker submitted at DL1 and confirm whether green fill/ shading is correct.</p>
1.5.38	Applicant	<p>Siemens Healthcare Limited</p> <p>Please provide a detailed summary in respect of negotiations with Siemens Healthcare Limited regarding their outstanding objection relating to the proposed easement over Wharf Road. Please advise whether any alternative routes exist and whether discussions have been held in respect of alternatives.</p>

Crown land and special category land		
1.5.39	All local authorities	<p>S131 and S132 of PA2008</p> <p>Are the local authorities aware of any irregularities in the applicant’s compulsory acquisition documents with regards to the classification of land, particularly with regards to s131 and s132 of PA2008? If so, explain with reasons.</p>

Q1.6. Cultural Heritage		
Cultural Heritage errata		
1.6.1	Applicant	<p>ES Appendix 7.5 Settings Assessment [APP-142] errata</p> <p>The ExA have noted some discrepancies within this document that require amending or an explanation if amendment is not needed. These are as follows:</p> <ol style="list-style-type: none"> 1) Paragraph 1.9.17 refers to Sansom's Platt but is under the heading of Hensington Earthworks. Correct this and ensure that the assessment provided is accurate for Hensington Earthworks. 2) Paragraph 1.9.50 states Lower Dornford is grade II* but elsewhere in the document it has been referred to as grade II. Ensure consistency and ensure the assessment reflects the status of the asset. 3) Paragraph 1.9.54 refers to Lower Dornford Farm and not Shipton Slade Farm. Correct this and ensure the assessment conclusions are correct.
1.6.2	Applicant	<p>Photomontages [APP-079] - errata</p> <p>Viewpoint 42 shows panels to the southeast of Cassington, whereas the plans show that panels would be located to the northwest. Coupled with this, the existing and illustrative photomontages for both Year 1 and Year 15 are incorrect [APP-079, Viewpoint 42].</p> <p>Re-issue with correct information and ensure that any individual asset assessments that rely on Viewpoint 42 are checked and amended as necessary.</p>
1.6.3	Applicant	<p>Change Request 1 - Outline Written Scheme of Investigation (OWSI) [CR1-005]</p> <p>The site location plans in Figure 1 of this document do not show the amendments to archaeological protection areas and Order Limits proposed by the change request. Please amend and re-issue this document.</p>
1.6.4	Applicant	<p>Change Request 1</p> <p>The key on the plan [CR1-007, Appendix A] is illegible. Please re-issue.</p>

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1.6.5	Applicant	<p>Gazetteers</p> <p>There are several separate Historic Environment gazetteers and tables, for example:</p> <ul style="list-style-type: none"> • [APP-142] Appendix A comprises the Designated Heritage Assets within the 2km Study Area, noting whether these have been scoped in or out for assessment; referenced with the National Heritage List England (NHLE) number. • [APP-131] Annex A provides a full list of designated and non-designated Heritage Assets that have been assigned a BW reference, referenced with their BW number and NHLE number. • [APP-132] Table 2 provides a gazetteer of all sites and landscapes within and just outside the Order Limits that were identified during the Archaeological surveys. These are referenced with an APS number. • [APP-133] provides written description of anomalies by Field Numbers but does not provide any identifying reference. • [CR1-003] Table 7.15 - Impact of the Project on designated Heritage Assets; referenced with NHLE numbers. <p>The plans show BW numbers that require cross referencing to various other tables, which is time consuming and confusing.</p> <p>Provide a separate table that combines references for the scoped in Assets and arranges them under site areas and field numbers. Suggested headings for this document are: Area (north, central, south); Field Number*; Name of Asset; Asset Type; BW ref; NHLE ref*; APS ref*.</p> <p>*If appropriate</p>
Above Ground Heritage Assets		
1.6.6	All Local Authorities	<p>Conservation Areas (CA)</p> <p>With regard to the affected conservation areas and the potential views into and out of these areas, the ExA note the responses in your LIR, submitted at DL1.</p> <ol style="list-style-type: none"> 1) Do you consider that any Neighbourhood Planning documents covering the affected conservation areas have been adequately addressed in the Applicant's assessments? 2) For affected conservation areas that do not have a current Character Appraisal, please note any views or particularly characteristics that you feel may be adversely affected by the proposals.

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1.6.7	Applicant	<p>Group Value</p> <p>In the settings assessment [APP-142], other than specific examples, your assessments do not appear to address, or make reference to, the group value of heritage assets and how these are perceived in the landscape. From the USI [EV2-001 to EV2-005] the ExA experienced that in some cases, several heritage assets were visible in the same view and as such, consider that their group value in relation to their settings, should also be assessed.</p> <p>Review your position on the group value that may be experienced in far reaching views and comment on the group values of assets within the landscape.</p>
1.6.8	Applicant	<p>Conservation Grazing</p> <p>Conservation grazing is mentioned in the Heritage Impact Assessment [APP-141], section 1.5. There are other ways of managing land in order to improve soil structure and quality that do not require the installation of solar panels. Explain why this should be considered a heritage benefit that could not be achieved by alternative farming practices?</p>
1.6.9	Historic England ICOMOS	<p>Aerial Views</p> <p>Aerial views over the World Heritage Site (WHS) and wider landscape are readily available from planes flying to and from Oxford Airport and RAF Brize Norton. Drone footage that includes views of the wider landscape is also seen in advertising literature for Blenheim Palace and in addition, the new rooftop tours at the Palace will afford greater views out towards the surrounding countryside.</p> <p>Do you consider that such views should be taken into account in terms of assessment of the setting?</p>
1.6.10	ICOMOS	<p>Maps of proposed omissions</p> <p>Your DL1 submission included plans and a written statement on areas of panels that you consider should be removed from the proposed development in order to be less oppressive to local villages and less harmful to the landscape. These plans were produced on the Preliminary Masterplan and consequently some areas you suggest for removal have already been taken out of the proposals.</p> <ol style="list-style-type: none"> 1) Please refer to [AS-020] for the most up-to-date illustrative masterplan and re-submit your representation. 2) Please ensure that the colours used provide distinction and clarity to your suggestions.

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1.6.11	ICOMOS	<p>Extent of proposed omissions</p> <p>Your DL1 submission proposes areas of panels that should be removed from the proposed development in order to be less harmful to the landscape. However, the landscape in question has no statutory designation and does not form part of a formal buffer to the World Heritage Site (WHS).</p> <p>You state in paragraph 1 of section B of your submission that <i>“ICOMOS-UK has an interest in sustaining the quality of the rural landscape in the UK, which in this instance contributes to the setting of the WHS”</i>.</p> <p>Explain how the areas of panels that you have identified in your submission contribute to the setting of the WHS and how the proposed development within these areas may be harmful to the setting.</p>
1.6.12	Applicant	<p>Response to ICOMOS Relevant Representation [RR-0413] and DL1 submission</p> <p>Whilst the applicant responded to RR at DL1, the ExA are keen to explore the suggestions of ICOMOS as to the areas for excluding solar panels to better protect Blenheim’s rural landscape that were submitted at DL1.</p> <p>Notwithstanding ICOMOS’s use of an earlier masterplan, in respect of each suggestion, provide any comments you wish to make and then, on an individual and cumulative basis, summarise the likely overall impact of such exclusions on the solar farm’s operational viability.</p>
1.6.13	Applicant	<p>Response to Historic England’s DL1 Submission</p> <p>Whilst some areas overlap with ICOMOS’ suggestions, the ExA are also keen to explore the suggestions of Historic England as to the field numbers that should be excluded from development in order to maintain Blenheim’s OUV.</p> <p>Provide any comments you wish to make and then, on an individual and cumulative basis, summarise the likely overall impact of such exclusions on the solar farm’s operational viability.</p>
1.6.14	ICOMOS Historic England West Oxfordshire District Council	<p>WHS Buffer zone</p> <p>The Blenheim Palace and Park World Heritage Site Management Plan 2017, Appendix III (Settings Study), indicates in chapter 2 that a formal buffer zone was not deemed necessary at the time of production due to existing designation protections, such as the Cotswold National Landscape, the Oxford Green Belt, and WODC Policy EW9 that includes wording designed to protect the wider landscape from potentially harmful development.</p>

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		Would the omissions proposed in the ICOMOS and Historic England DL1 submissions provide sufficient buffer to protect the rural landscape that is important to the setting of Blenheim Palace?
1.6.15	Applicant	<p>Blenheim Palace WHS – assessment of setting (1)</p> <p>Paragraph 3.02 of the Blenheim Palace and Park World Heritage Site Management Plan 2017, Appendix III, Settings Study states: <i>“the objective of protection of the setting not only has value in its own right in protecting the OUV of the WHS but also contributes directly to the economy, health and welfare of its surrounding villages and residents, by taking account of the distinctive character of the landscape and the green infrastructure it helps to provide.”</i></p> <p>Explain how this statement has been explored and assessed throughout the Heritage Impact Assessment (HIA) [APP-141].</p>
1.6.16	Applicant	<p>Blenheim Palace WHS – assessment of setting (2)</p> <p>Following on from Q1.6.15 above, the RR from Historic England [RR-0398] and DL1 submission considers the impact on the setting of the WHS as greater than negligible.</p> <p>Explain how the findings of no harm to the setting have been reached in light of the statement in the WHS Management Plan and Historic England’s submissions.</p>
1.6.17	Applicant	<p>Response to Historic England DL1 Submission</p> <p>Please provide a response to paragraphs 5.44 to 5.46, 5.49, 5.50, 5.51 relating to a more detailed assessment of the potential impact on Attributes 1, 4 and 5 and 7 of the OUV of the WHS.</p>
1.6.18	Applicant	<p>Church of St Peter and St Paul, Church Hanborough (Gd I)</p> <p>It is acknowledged in [APP-142, paras 1.9.28 to 1.9.31] that views towards the Church would change.</p> <ol style="list-style-type: none"> 1) Given that only one viewpoint towards the Church is provided (viewpoint/ photomontage no. 27) which is approx. 1.5kms distant, and given that closer views are likely to be even more disrupted by the panels, how is the assessment of “barely affected” arrived at and justified? 2) The RR from Historic England [RR-0398] considers the impact on the setting of the WHS as greater than negligible. Explain in more detail how you came to your conclusions, or reconsider your position, providing clear assessment and reasoning.

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1.6.19	Applicant	<p>Church of St Peter, Cassington, (Gd I) (1)</p> <p>Regarding [APP-142, paras 1.9.32 – 1.9.34] the submissions from Historic England ([RR-0398] and DL1) consider the impact on the setting of the Church as greater than negligible. Explain in more detail how you came to your conclusions, or reconsider your position, providing clear assessment and reasoning.</p>
1.6.20	Applicant	<p>Church of St Peter, Cassington, (Gd I) (2)</p> <p>As required by question 1.6.2 above, photomontage 42 requires amendment. Once this has been completed it is considered that this photomontage will not convey the potential impact of the panels on the setting of the Church.</p> <p>Provide an additional photomontage from a more appropriate location and reassess the potential impact.</p>
1.6.21	Applicant	<p>Church of St Michael, Begbroke (Gd II*)</p> <p>Paragraphs 1.9.39 to 1.9.41 [APP-142] states that there are views towards the Church and the neighbouring former Priory that indicate a complex of ecclesiastical buildings. From the ExA's USI, it was clear to the ExA that there will be intervisibility between the Churchyard and the panels, and vice versa.</p> <ol style="list-style-type: none"> 1) In light of the above, explain how the assessment of negligible impact has been reached. 2) Given the Grade II listing of the neighbouring St Philip's Priory buildings and separate Grade II listing for the attached Church of St Philip, explain why these Assets have not also been assessed, both separately and for their group value. 3) The RR from Historic England [RR-0398] and their DL1 submission considers the impact on the setting of the Church as greater than negligible. Explain in more detail how you came to your conclusions, or reconsider your position, providing clear assessment and reasoning.
1.6.22	Applicant	<p>Swinford Bridge (Gd II*)</p> <p>The scale of the Horizontal Directional, Drilling (HDD) entry and exit compounds close to Swinford Bridge that are outlined in [APP-130] are substantial. It is appreciated that construction traffic is not proposed to use Swinford Bridge, however in the event that there may be additional usage of the bridge during construction by other vehicles, explain:</p>

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		<ol style="list-style-type: none"> 1) How Swinford Bridge may be impacted during construction in terms of additional traffic, access to the south bank etc and how this might impact the setting or structure. 2) Whether a commitment to repairs, undertaken to best conservation method and practice will be secured prior to any use of the bridge for additional traffic.
1.6.23	Applicant	<p>Hoardley House (Gd II*)</p> <p>The ExA observed from USI5 that the experience of Hoardley House extends to the east and southeast, and into the areas of proposed panels whereas the Settings Assessment [APP-142] only considers potential intervisibility and not the wider meaning of experience.</p> <p>The ExA request further detail in respect of the assessment conclusions reaching a negligible impact and minor adverse effect. Explain in more detail how you came to your conclusions, or reconsider your position, providing clear assessment and reasoning.</p>
1.6.24	Historic England	<p>Swinford Bridge (Gd II*) and Hoardley House (Gd II*)</p> <p>The ExA note that you have not included reference to Swinford Bridge or Hoardley House in either your RR [RR-0398] or your DL1 submission. Please confirm whether you have any particular concerns regarding the setting of these Grade II* Heritage Assets.</p>
1.6.25	Applicant	<p>Shipton Slade Farm Group (Gd II)</p> <p>Following the USI [EV2-004], the ExA has concerns over the assessment for this property presented within [APP-142, paras 1.9.51 – 1.9.54].</p> <p>Whilst it is acknowledged that the principal aspect of the complex is to the south, this does not diminish the contribution of the open farmland to the north and this historic context of the hamlet in its landscape has not been considered in the assessment.</p> <p>It would appear that the setting of this group could be severely impacted by the introduction of panels with only a limited buffer zone.</p> <ol style="list-style-type: none"> 1) Further explain how the assessment of impact arrived at a finding of negligible adverse or reconsider your assessment. 2) Explain why such a limited buffer zone is proposed.
1.6.26	Applicant	<p>Burleigh Farmhouse (Gd II)</p> <p>Your assessment notes the principal elements of setting as the associated farm buildings [APP-142, paras 1.9.68 – 1.9.71] but ignores the historic context of the farm in its landscape, which provides the reason for the farm's existence.</p>

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		<p>No buffer zone is proposed to the east and with land rising; this could have an impact on the setting and therefore significance of the heritage asset.</p> <ol style="list-style-type: none"> 1) Provide a wider consideration for the significance of the farm, including its historic landscape setting. 2) Further explain the reasons for the assessment of only slight harm to the significance or reconsider your assessment. 3) Explain why no buffer zone is provided to the east.
1.6.27	Applicant	<p>Mill Farmhouse Group (Gd II)</p> <p>Your assessment notes the extensive setting along the floodplain of the River Evenlode and the hill to the east towards Purwell Farm [APP-142, paras 1.9.72 – 1.9.76], but appears to ignore the historic context of the farm in its landscape, which provides the reason for the farm's existence. Given this, and the location of the panels to the south and east, and PCS to the east:</p> <ol style="list-style-type: none"> 1) Provide a wider consideration for the significance of the farm, including its historic landscape setting. 2) Further explain the reasons for the assessment of only slight harm to the significance or reconsider your assessment. 3) Explain why a more substantial buffer has not been provided, particularly to the south.
1.6.28	Applicant	<p>Dunbar Farmhouse (Gd II)</p> <p>Your assessment notes the elevated position of the farmhouse and that there are extensive views to the east and south, looking across the Evenlode valley, and that the setting makes a reasonable contribution to the buildings' significance [APP-142, paras 1.9.77 – 1.9.80].</p> <p>Given this elevated position and the location of the panels to the south and east, explain in greater detail the reasons for the assessment of only 'slight harm' to the significance, or reconsider your assessment.</p>
1.6.29	Applicant	<p>Upper Whitley Farmhouse (Gd II)</p> <p>Your assessment notes the principal elements of setting as the associated farm buildings [APP-142, paras 1.9.98 - 1.9.100], but appears to overlook the historic context of the farm in its landscape, which provides the reason for the farm's existence. Its elevated position and historic association with the surrounding land creates a much wider setting and the proposed Project</p>

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		<p>Substation and the potential presence of the National Grid Substation within this has not been assessed.</p> <ol style="list-style-type: none"> 1) Further explain how the assessment of no change was concluded or reconsider your assessment. 2) Provide further assessment that includes the presence of the project substation and also the National Grid Substation, should it be located within the Order Limits
1.6.30	Applicant	<p>Bladon Conservation Area</p> <p>The assessment identified that the screened perimeter of the development would be clearly visible within a number of significant views (as identified within the Bladon Conservation Area Character Appraisal) [APP-142, paras 1.9.106 - 1.9.110] yet offers no assessment of the possible impact, merely stating that the significance of the CA would be slightly harmed. Further explain the assessment that led to a conclusion of low adverse impact or reconsider your assessment.</p>
1.6.31	Applicant	<p>Begbroke Conservation Area</p> <p>The assessment of the CA [APP-141, paras 1.9.111 - 1.9.114] omits information regarding the sensitivity of the views back towards the church and priory as outlined in question 1.6.15 above. Further explain the assessment that led to a conclusion of negligible impact, or reconsider your assessment</p>
1.6.32	Applicant	<p>Church Hanborough Conservation Area</p> <p>The last sentence of paragraph 1.9.117 [APP-142, paras 1.9.115 - 1.9.118] is confusing. If it means that there would be views towards the conservation area that include the prominent church spire that would be impacted, this has not been clearly assessed and it is therefore not clear how the conclusion of slight harm has been reached.</p> <ol style="list-style-type: none"> 1) Expand on this assessment to include the nature of harm and from where this might be experienced. 2) Further explain the assessment that led to a conclusion of low adverse impact, or reconsider your assessment

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1.6.33	Applicant	<p>Cassington Conservation Area [APP-142, paras 1.9.119 - 1.9.125]</p> <p>Following on from question 1.6.2 and the issues with Viewpoint 42, the ExA has further concerns. Given the errors in this photomontage, it is not clear how the assessments have been made. In addition, the assessment for Cassington relies heavily on the whether or not the panels will be visible from specific points rather than taking a wholistic approach to the potential impact on the character of the village. This includes single direction views from the outlying recreation ground, from which the panels will be prominent.</p> <ol style="list-style-type: none"> 1) Expand on the assessment, taking into account a wider consideration of the character of the village. 2) Further explain the assessment that led to a conclusion of low adverse impact or reconsider your assessment.
Archaeology		
1.6.34	Applicant	<p>Assessment of non-designated archaeological sites.</p> <p>In ES Chapter 7 [CR1-003] Table 7.5 refers in several places to <i>“A total of 44 areas containing significant buried archaeological remains have been avoided and sufficiently buffered within the Project design as shown on the Illustrative Masterplan presented as Figures 2.1 – 2.3 within Volume 2, Figures of the ES”</i></p> <p>[APP-132, paragraph 5.3] identifies 49 records that lie within the site boundaries, with a further 5 sites that lie just outside with the potential to extend into the Order Limits therefore 54 sites in total.</p> <ol style="list-style-type: none"> 1) Explain the discrepancies between these documents. 2) Provide a table indicating which sites have been included for assessment, including their BW/APS/NHLE references (as appropriate), ordered by field number.
1.6.35	Applicant Oxford County Archaeology Service	<p>Buffer Zones around non-designated archaeological sites</p> <p>ES Chapter 7 [CR1-003, Paragraph 7.9.7] refers to “appropriate buffer zones.”</p> <p>Applicant - Explain what is “appropriate” and how this figure/measurement has been established for each asset?</p> <p>Oxford County Archaeology Service - are you in agreement with the identified areas of non-designated archaeology and their respective buffer zones?</p>

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1.6.36	Oxford County Archaeology Service Historic England	Outline Written Scheme of Investigation Are you in agreement with all aspects of this document [CR1-005]? Please provide any concerns/ amendments etc in full.
1.6.37	Oxford County Archaeology Service Historic England	Designated Archaeological sites Based on the evidence provided in [APP-133] and [APP-143] and with regards to a) Sansom's Platt, b) Rectangular Earthworks, Hensington, c) Blenheim Villa and Associated field system: 1) Are you in agreement with the significance assessment of these Scheduled Monuments? 2) Do you agree with the buffer zones that are proposed?
1.6.38	Applicant	Sansom's Platt (SM) In their RR [RR-0398] and DL1 submission, Historic England consider the potential impact as greater than negligible due to the modern intrusion that will detract from the significance of the monument through the impact upon the appreciation of the rural surroundings. Explain in more detail how you came to your conclusions or reconsider your assessment.
1.6.39	Applicant	Piling Impacts ES Chapter 7 [CR-003] Paragraphs 7.9.30 to 7.9.44 indicate that the solar farm would be beneficial due to the cessation of ploughing. However, the potential impact of the required piling is not discussed or brought into this assessment, leaving an unquantifiable effect that requires addressing. Include these impacts in your assessment and reconsider the outcome/ conclusions reached in light of the additional evidence.
1.6.40	Applicant	Surface-laid cables - significant archaeology ES Chapter 7 [CR-003] paragraph 7.9.7 notes that any cables that are required to cross areas of significant archaeology will be placed in protective ducts and placed on the ground surface. Provide more detail in terms of how many of the archaeological sites this may affect, how many cables this might entail, how large the ducts will be and how this may impact on the openness of the land and, where public access remains, how walkers would be protected from trip hazards.
1.6.41	Applicant	Surface-laid cables - Less significant archaeology Paragraph 7.9.33 of [CR1-003] states that following further site investigation, appropriate strategies during construction could include the placement of any cables within protective ducts

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		<p>placed on the surface of the ground, or the implementation of an appropriate programme of archaeological investigation ahead of construction.</p> <ol style="list-style-type: none"> 1) Explain what an “appropriate programme of archaeological investigation” might entail in these circumstances. 2) Explain what surface laid cables might look like, how they would be protected, how this would impact on the ability to use the land for conservation grazing.
1.6.42	Applicant	<p>Cable Route and accessible areas in areas of significant archaeology.</p> <p>ES Chapter 7 [CR-003] paragraph 7.9.8 notes that significant archaeological remains may be identified through pre-construction geophysical survey and/ or trial trenching along the proposed route of the 275 kilovolt (kV) cable.</p> <p>The additional mitigation proposed suggests an appropriate programme of archaeological investigation prior to construction.</p> <ol style="list-style-type: none"> 1) Explain what this might entail, given that this paragraph indicates that the archaeology would have been discovered through investigation prior to construction? 2) Explain how this mitigation is explicitly secured within the oWSI and DCO
1.6.43	Applicant	<p>Cable Route and accessible areas in areas of less significant archaeology (1)</p> <p>ES Chapter 7 [CR-003] paragraph 7.9.34 notes that locally important archaeological remains may be identified through pre-construction geophysical survey and/ or trial trenching along the proposed route of the 275 kV cable.</p> <p>The additional mitigation proposed suggests an appropriate programme of archaeological investigation prior to construction. Explain what this might entail, given that this paragraph indicates that the archaeology would have been discovered through investigation prior to construction? Explain how this mitigation is explicitly secured within the oWSI and DCO</p>
1.6.44	Applicant	<p>Cable Route and accessible areas in areas of less significant archaeology (2)</p> <p>ES Chapter 7 [CR-003] paragraph 7.9.35 notes that less significant archaeological remains could be present within the easement required for construction of the 275 kV cable within areas that are not accessible for pre-construction surveys and therefore potentially only discoverable during construction.</p> <p>The additional mitigation proposed is indicated in a provisional tense, suggesting alternatives, but also suggests investigation ahead of/ during construction.</p>

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		<ol style="list-style-type: none">1) Please provide a more definitive statement of the proposed mitigation if such circumstances arise.2) Explain how this mitigation is explicitly secured within the oWSI and DCO.
1.6.45	Applicant	<p>Archaeological Investigations</p> <p>ES Chapter 7 [CR1-003] paragraph 7.4.13 states that archaeological trial trenching was commenced in August 2024 and the report will be submitted as soon as possible.</p> <ol style="list-style-type: none">1) Submit these results or provide an update on when you expect to be able to submit.2) Respond to paragraphs 5.69 and 5.70 of Historic England's DL1 submission.

Q1.7. Draft Development Consent Order		
Interpretation and Articles		
1.7.1	Applicant	<p>Ensuring correct terminology</p> <p>The dDCO refers to the 'permanent close of a Public Right of Way'. Is this the correct terminology, or is this meant to read 'stopping up'? Please examine all wording in relation to closures and stopping up and reflect on whether what is actually intended would be delivered through the dDCO.</p>
1.7.2	Applicant	<p>Correct referencing</p> <p>In the Part 1 Interpretation, it would appear that the 1961 Act and the 1965 act (m) and (n) are out of logical sequence. Please address.</p>
1.7.3	Applicant	<p>Definition of maintain</p> <p>The definition of maintain includes the caveat of "but not remove, reconstruct or replace the whole of Work No.1 at the same time."</p> <ol style="list-style-type: none"> 1) What is envisaged by this clause and what constitutes 'at the same time'? 2) What is meant by the word 'whole' and could a more specific figures be applied? 3) What does this actually allow the Applicant to do and what are the limits the public and local authorities can expect to result from this clause? 4) If replacing a lot of infrastructure in Work No.1 at the same time, would construction compounds be required for the lay-down, storage of new and old panels and for workers involved with the maintenance? 5) If replacing a lot of infrastructure, would haul roads need to be re-laid? 6) If replacing a lot of infrastructure, but not the 'whole' project, would the terms of the code of construction practice serve as enforceable provisions?
1.7.4	All local authorities Natural England Environment Agency Statutory Undertakers	<p>Disapplication of legislative provisions</p> <p>Article 6, together with Schedule 3, of the dDCO relate to the disapplication of legislative provisions. Set out whether there are any anomalies on the list, whether there is any disagreement in respect of any provision being disapplied and set out any reasons behind this disagreement (if any exist).</p>

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1.7.5	Applicant Local Highway Authority	Street authority scope In Articles 9(5) and 10(6), it refers to the undertaker being the street authority. The implication in Article 10(6) appears to be that streets where the undertaker is the street authority do not need to be maintained. Is that a reasonable interpretation?
1.7.6	Applicant Local Highway Authority	Usage of Public Rights of Way (PRoW) Article 11(1)(b) authorises the Applicant to allow the use of public rights of way by motor vehicles. <ol style="list-style-type: none"> 1) Why is this power necessary? 2) Is there a list of such paths where this is anticipated and have those paths been assessed as to their suitability to take motor vehicles? 3) Where in the dDCO is the restoration and reinstatement of these paths secured?
1.7.7	Applicant Local Highway Authority	Access to premises Article 11(2) affords access for pedestrians to premises. <ol style="list-style-type: none"> 1) What about those with vehicles needing to access premises or houses? 2) If vehicles are temporarily unable to access premises, how will this displacement be managed including any displaced parking in the area?
1.7.8	Applicant Local Highway Authority	Traffic Regulation Orders Article 16(2) seems to suggest the Applicant can impose traffic restrictions on any road, regardless of whether it is within the Order limits or not. Clarify the situation and, if that is what is intended, justify the scope of the powers sought.
1.7.9	Applicant	Tree preservation orders Under Article 39, is it appropriate to allow for a tree covered by a preservation order to be felled without any requirement to replace it? Should not a ratio of 1:1 for felled trees be more equitable for nature?
1.7.10	Applicant Local Highway Authority National Highways	Article 41 Article 41 is stated to follow wording seen within Transport and Works Acts Orders. No equivalent precedent is cited from the Planning Act 2008 (PA2008) regime. Explain with reasons.

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1.7.11	Applicant	<p>Community educational facility</p> <p>The Applicant has provided illustrative drawings of the educational building to be constructed. It is not clear to the ExA which article or requirement in the dDCO would actually deliver this building or control/ stipulate its size, scale or appearance. Explain where this is detailed, controlled and secured.</p>
1.7.12	Applicant	<p>Article 22</p> <p>It is noted that Article 22 is drafted to enable compulsory acquisition of new rights over all of the Order land, with a schedule which limits the compulsory acquisition power in defined plots to the defined rights listed in schedule 9. Please justify and explain the need for such an approach and how this complies with guidance detailed in <i>Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land</i> published by DCLG (now MHCLG).</p>
1.7.13	Applicant	<p>Article 24</p> <p>The Explanatory Memorandum [AS-011, paragraph 3.5.11] states the basis for the article's wording is on a dDCO for a scheme that the ExA notes has not yet been through Examination, let alone its recommendation period. Why is it appropriate to base the wording for this article on an unmade, unexamined Order?</p>
1.7.14	Applicant	<p>Article 29</p> <p>For clarity, please amend the first sentence of Article 29 to include express reference to the land in question being allowed "to be temporarily used for the carrying out of the authorised development".</p> <p>Please provide must be evidence to show that persons with an interest in the Order land were aware that undefined new rights were being sought over all of the Order land and were consulted on that basis.</p>
1.7.15	Applicant	<p>Articles 29 and 30</p> <p>It is noted that Articles 29 and 30 give temporary possession powers allow temporary possession of any of the Order land, with Article 30 also allowing temporary possession over additional land within the wider Order limits. As such, temporary possession powers are not limited to the land specified in Schedule 11.</p>

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		Please justify why wider powers, which also allow temporary possession of land not listed in Schedule 11, are necessary and appropriate and explain what steps they have taken to alert all landowners, occupiers, etc. within the Order land to this possibility.
Requirements		
1.7.16	Applicant	Requirement 3 Under Schedule 2 Requirement 3 of the dDCO, clarify the scope of what "amendments" are permissible to the proposed development. Also set out justification as to why the SoS is not part of this amendment process.
1.7.17	Applicant	Requirement 4 Schedule 2 Requirement 4 establishes a community liaison group during the course of construction. Could or should that be extended, albeit with perhaps different terms of reference, for the operational period so that residents have a direct conduit of information with representatives throughout the lifespan of the project?
1.7.18	Applicant	Requirement 5 Requirement 5(2) refers to the OLDP document. Would the Requirement better be written as needing a Full/ Detailed Layout and Design Principles document in accordance with the outline as in the case of other management plans referred to in Schedule 2?
1.7.19	Applicant All local authorities Oxford County Archaeology Services	Requirement 10 Is there not a need to require a Detailed Archaeological Mitigation Strategy to be submitted and approved as well?
1.7.20	Applicant National Highways	Requirement 11 Does National Highways need to be referenced as either a discharging body or consultative body, having particular regard to the construction traffic management plan?
1.7.21	Applicant	Clarification of terms The dDCO appears to use the terms fibre optic cables and telecommunications cables interchangeably. Explain whether they constitute one and the same, or if they serve different purposes.

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Schedules		
1.7.22	Applicant Statutory Undertakers	Protective Provisions Please review the protective provisions contained in the dDCO. <ol style="list-style-type: none"> 1) Advise whether there is written agreement or disagreement on the protective provisions as drafted. 2) If there is disagreement, highlight those areas where dispute exists and the positions of the parties behind this dispute. 3) If the Statutory Undertaker(s) are unhappy, the Statutory Undertakers to provide a full copy/ transcript of their preferred protective provisions and set out the reasons behind the differences with those submitted by the Applicant.
1.7.23	Applicant Statutory Undertakers	Definitions In Schedule 1(1) there is reference to 'auxiliary equipment'. It is not known whether this is classed as associated development, ancillary development or some other term that is not covered by PA2008. Explain and elaborate on this term.
1.7.24	Applicant National Grid Electricity Transmission	Full work details required Work No.2 in the dDCO simply states "development of a New National Grid substation" without any breakdown of the apparatus or equipment that comprises this work. Set this out fully within the Order.
Controlling Documents for the dDCO		
1.7.25	Applicant	Discrepancy in details In paragraph 2.9 of the guide to the application, it provides dimensions of the substation with a maximum height cited of 15 metres [APP-004]. This height is also repeated in the Statement of Statutory [APP-018] Nuisance at paragraph 1.4.10. Meanwhile, paragraph 1.3.6 of the Explanatory Memorandum [APP-017] says the maximum height would be 12 metres. Furthermore, the Statement of Statutory Nuisance, at paragraph 1.4.10 states the maximum height of 15 metres excludes connecting tower structures, but no detail is given as to the prospective height of those. The revised OLDP states the main building would be 14m high and not 12 metres.

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		<ol style="list-style-type: none"> 1) Clarify the situation, rectify any errors so that all documents are consistent and tell the ExA categorically the parameters that were used within the Landscape and Visual Impact Assessment. 2) Explain why a requirement, specifying the maximum parameters of the proposed development, is not written on the face of the dDCO. 3) Without prejudice, provide wording for a requirement specifying the parameters of the proposed development.
1.7.26	Applicant	<p>Other Consents and Licences</p> <p>Within the Consents and Licences position statement, there are a number of additional consents required with some listed as being "not started." Has any progress been made towards applying for or obtaining these and if not, why not?</p>
1.7.27	<p>All local authorities</p> <p>Natural England</p> <p>Environment Agency</p> <p>Historic England</p> <p>Statutory Undertakers</p>	<p>Management Plans</p> <p>A number of management plans are submitted with the application.</p> <ol style="list-style-type: none"> 1) Review those management plans and set out clearly what changes, if any, you consider necessary. It may be better to put these in a tabular format. As long as the rationale behind the proposed amendments are explained. 2) Are there any management plans promised in the future (see Table 1.1 of the Outline Code of Construction Practice) that you consider are important or critical to be reviewed during the Examination, and thus the Applicant should submit now?
1.7.28	Applicant	<p>Side agreements and legal agreements</p> <p>Set out which local authorities or statutory bodies are being engaged in either side agreements or, if applicable, legal agreements pursuant to section 106 of the Town and Country Planning Act 1990. Give a broad overview of what is sought to be achieved within these agreements.</p>

Q1.8. Ecology and Biodiversity		
Ecological interests		
1.8.1	Applicant	<p>Clearer plans required</p> <p>The Hedgerow Removal Plans are at an inaccessible scale. Please provide 1:500 drawings for each of the areas where hedges are to be removed so that a proper appraisal of their length and extent can be ascertained.</p>
1.8.2	Applicant	<p>Compounds in the Environmental Statement</p> <p>ES Chapter 9 [APP-046] makes some reference to compounds, but there appears little assessment as to the actual impacts arising from either main project compounds or the satellite temporary compounds (or how their locations were chosen). Set out clearly the potential impacts upon fauna and flora (for example from noise, dust, disturbance, lighting etc) arising from the compounds and how the locations proposed took into account ecological sensitivity.</p>
1.8.3	Applicant	<p>Substations in the Environmental Statement</p> <p>Apart from table 9.7.1 in the ES [APP-046], there is little to no reference to either the National Grid Electricity Transmissions Plc (NGET) substation, main projection substations, or the other smaller substations, or the 156 power converters. On the face of ES Chapter 9, there appears little assessment undertaken as to the construction or operation effects on wildlife (noise, dust, lighting, duration, electro-magnetic fields, emissions etc). Set this information out clearly, including any adjustments required to the ES.</p>
1.8.4	Applicant	<p>Cumulative impacts in the Environmental Statement</p> <p>There appears to be no in-depth assessment in ES Chapter 9 [APP-046] regarding the potential cumulative impacts or effects of siting the NGET substation outside of the Order limits, together with additional solar panels within the Order limits. Equally, there is only a passing remark about this in ES Chapter 20 [APP-057], without any ready understanding of the assessment that has taken place to substantiate the conclusions reached. Explain with reasons.</p>
1.8.5	Applicant	<p>Buffer zones</p> <p>The ExA wish to ensure that all the buffer zones relied upon by the Applicant to result in 'no change' conclusions (as per paragraphs 9.9.28 to paragraph 9.9.63) are secured and</p>

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		evidentially robust. Signpost exactly where these buffers are secured in the relevant management plans and the dDCO.
1.8.6	Applicant Natural England	<p>Skylarks</p> <p>Skylark plots are proposed within the proposed development.</p> <ol style="list-style-type: none"> 1) Is there any evidence to substantiate that the skylark plots proposed, in and amongst the solar panels, would actually be effective? 2) With the presence of grazing sheep underneath the panels, would this not impact on the effectiveness of the skylark plots?
1.8.7	Applicant Natural England	<p>Wintering bird assemblage</p> <p>In ES Chapter 9 paragraph 9.9.102 [APP-046], it states there would be a moderate adverse and significant impact on the wintering bird assemblage, mainly due to 'temporary displacement.' Table 9.16.1 then concludes that there would be no change for the wintering bird assemblage.</p> <p>Why is displacement considered temporary when, post-construction, the operation of the solar farm would be in place for 40 years?</p>
1.8.8	Applicant	<p>Bat mitigation</p> <p>Natural England's RR [RR-0761] details comprehensive concerns regarding bat surveys and mitigation measures for bats. Set out to the ExA what is going to be done, and when, to resolve these fundamental concerns during Examination.</p>
1.8.9	Applicant	<p>Dormouse</p> <p>Natural England's RR [RR-0761] details comprehensive concerns regarding dormouse and the level of protection in the Outline Landscape and Ecology Management Plan (OLEMP). Set out to the ExA what is going to be done, and when, to resolve these fundamental concerns.</p>
1.8.10	Applicant Natural England	<p>Monitoring</p> <p>Applicant: Monitoring commitments listed in Table 9.10.1 of ES Chapter 9 appear to be low in number. Is there a reason why monitoring is not considered to be an important or necessary part of the mitigation review?</p> <p>Natural England: Do you have any concerns about the scope of monitoring being proposed?</p>

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1.8.11	Applicant Natural England	<p>Piling in the Environmental Statement</p> <p>Applicant: ES Chapter 9 [APP-046] identifies that impact piling to 3 metres throughout the entire Project site represents the maximum design scenario, which could lead to continuous disturbance of species through noise and vibration impacts. A large number of piles are predicted to install the solar panels.</p> <p>However, the ES only mentions piling a few times, largely in the context of decommissioning (for example, paragraph 9.9.336) with little detail in relation to construction works.</p> <p>Explain why the construction has not been explicitly or separately assessed the disturbance impacts arising from piling on any species in ES Chapter 9.</p> <p>Natural England: Provide any comments you wish on this situation.</p>
1.8.12	Applicant Natural England	<p>Noise impacts to wildlife</p> <p>ES Chapter 13 [APP-050], Table 13.25, sets out that there would be high noise impacts where a receptor is less than 1,344m from piling activities. Many ecological receptors are well within that distance. In the case of SSSIs that support overwintering birds and ancient woodlands that are home to a variety of wildlife, this noise could be highly disruptive. Set out why this level of noise is not recognised or identified as requiring mitigation.</p>
1.8.13	Applicant	<p>Sites of Special Scientific Interest</p> <p>Natural England's RR [RR-0761] highlights that, whilst there is general agreement with the conclusions reached in respect of Sites of Special Scientific Interest (SSSI), there are missing or misrepresented parts of the assessment. For completeness, provide a revised chapter taking into account Natural England's concerns.</p>
1.8.14	Environment Agency Natural England Beds Bucks Oxon Wildlife Trust	<p>Lack of survey data</p> <p>Within ES Chapter 9 [APP-046], table 9.3.1 reports, in response to the Environment Agency, that no surveys are being carried out for water voles. Paragraph 9.6.77 states no surveys have been carried out for fish. Paragraph 9.9.694 states no surveys have been done for otters.</p> <p>Given the Proposed Development is in close proximity to watercourses, proposes HDD underneath major watercourses (with the potential for bentonite breakout to be managed) and involves transformative proposals along waterways (e.g. River Evenlode), should surveys be undertaken?</p>

Deadline for responses is Deadline 2, 1 July 2025

1.8.15	Natural England	Outline Landscape and Ecology Management Plan (OLEMP) There is no specific reference to good practice measures being undertaken within the OLEMP to manage, for example, hedgehogs. What measures would you expect/ request the Applicant to adopt and why?
1.8.16	Applicant	OLEMP completion Complete Table 13.1 in the OLEMP [APP-228], removing all 'to be confirmed' with an appropriate plan of monitoring.
1.8.17	Applicant	Licensing Natural England's RR [RR-0761] references the need to obtain various licenses for the Proposed Development. <ol style="list-style-type: none">1) Are these accounted for in your document at [APP-035] or does that document need to be updated?2) Are the licenses included or provided for in any way within the dDCO at present, or is there acceptance these need to be obtained separately?3) Set out a timetable for obtaining the licenses required.

Q1.9. Environmental Impact Assessment		
Areas for further evidence		
1.9.1	Applicant	<p>Baseline, methodology and scope of assessments</p> <p>The post-hearing submissions from all local authorities suggest that the local authorities had little input into the ES chapters, methodologies were not agreed in advance, views were discounted, or otherwise the Applicant rejected Council requests on the grounds of proportionality.</p> <p>Could the applicant:</p> <ol style="list-style-type: none"> 1) explain the methodologies within the ES and the efforts made to agree these with the relevant IPs? 2) set out what ‘proportionality’ tests were applied given the nature, size and scale of the proposed development?
1.9.2	Applicant	<p>ES Chapter 17 et al</p> <p>The Written Representation (WR) of Nigel Roderick Pearce at DL1 challenges the matrices used in formulating this chapter and that, as a result of the choices made, there appears “structural bias” in the way the ES has been prepared. How do you respond?</p>
Matters of clarification		
1.9.3	Applicant	<p>Procedural Deadline B</p> <p>The Applicant is requested to note that the Rule 6 letter [PD-006] set out a list of issues requiring clarification that were described as ‘examples’ and ‘non exhaustive.’ It was hoped that this would have prompted an investigation into all chapters of the ES in order to ensure consistency. However, you confined your review only to those matters the ExA drew to attention [PDB-015]. Review the whole of the ES and ensure that, if indeed table 6.3 is the worst-case scenario underpinning each chapter, that the ES reflects this in its entirety.</p>

Deadline for responses is Deadline 2, 1 July 2025

Q1.10. Flood Risk, Hydrology and Water Resources		
Flood risk		
1.10.1	Applicant	<p>New National Flood Risk Assessment</p> <p>Noting the publication of the new National Flood Risk Assessment by the Environment Agency (EA), please confirm whether an updated Flood Risk Assessment (FRA) [APP-166] and Chapter 10 of the ES [APP-047] are to be submitted into the Examination? Please confirm at which deadline the amendments documents will be submitted.</p> <p>If no update is necessary, please provide a detailed justification.</p>
1.10.2	Applicant	<p>Revision to the NPPF</p> <p>The ExA notes the revisions made to the NPPF in December 2024 regarding the Exception Test. Taking these amendments into consideration, please confirm whether any amendments are necessary in respect of the submitted Environmental Impact Assessment (EIA) and Flood Risk Assessment (FRA).</p>
1.10.3	Applicant	<p>Flood risk assessment – minor errors and omissions</p> <p>Noting the content of Appendix 2 of the EA's RR [RR-0308], please confirm if the identified reporting errors and omissions have been amended/ included? Please confirm when/ if an updated version of the FRA is to be submitted into the Examination.</p>
1.10.4	Applicant	<p>Flood defences – construction phase</p> <p>It is noted that a minimum vertical clearance would be maintained between HDD activities and the hard bed of a watercourse and the landward toe of the flood defences (Paragraph 10.9.82 of ES Chapter 10 [APP-047]). However, the actual clearance distance would not be confirmed until post consent.</p> <p>Given the importance of ensuring that such flood defences are adequately protected, please confirm why the clearance distance cannot be provided during the Examination.</p>
1.10.5	Applicant	<p>Flood defences – maintenance plan buffer zone</p> <p>Paragraph 10.9.90 of ES Chapter 10 [APP-047] states that where possible, during operation, any maintenance works would avoid a 16m buffer zone from flood defences. It is further stated that this would be secured in the outline Operational Management Plan (OMP) [APP-234].</p>

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		Please signpost to where this is detailed within the outline OMP.
1.10.6	Applicant	<p>Potential impact of damage to existing field drainage</p> <p>Please explain in further detail why the likely significance of effect during the decommissioning phase is stated as being of 'minor adverse significance' (Paragraph 10.9.125 of ES Chapter 10 [APP-047]) but the effect is of 'negligible adverse significance' during the construction phase (Paragraph 10.9.107 of ES Chapter 10 [APP-047]).</p>
1.10.7	Applicant	<p>Potential impact of damage to existing water supply and wastewater drainage infrastructure</p> <p>Please explain in further detail why the likely significance of effect during the decommissioning phase is stated as being of 'minor adverse significance' (Paragraph 10.9.154 of ES Chapter 10 [APP-047]) but the effect is of 'negligible adverse significance' during the construction phase (Paragraph 10.9.136 of ES Chapter 10 [APP-047]).</p>
1.10.8	Applicant	<p>Impermeable areas</p> <p>Within the Order limits what are the total impermeable areas associated with:</p> <ul style="list-style-type: none"> a) the current site; and b) the proposed development site layout? <p>Please signpost to this information or provide separate calculations for both temporary and permanent infrastructure.</p>
1.10.9	Applicant	<p>Flood risk assessment</p> <p>Please confirm if there is an error in the second sentence in paragraph 6.2.3 of the FRA [APP-166]. Should this sentence confirm that the site is considered to be at a low risk of groundwater flooding?</p>
1.10.10	Applicant	<p>Flood risk assessment</p> <p>Please confirm why, despite the solar panels being elevated above modelled flood depths, it is considered appropriate to locate panels in areas at risk of surface water flooding?</p>
1.10.11	Applicant	Conceptual Drainage Strategy

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		<p>Paragraph 3.4.2 of the Conceptual Drainage Strategy [APP-167] refers to vegetated areas which would compromise of appropriate seeded vegetation to combat potential erosion and channelisation.</p> <p>Please confirm whether these strips are different to the vegetation to be planted for livestock grazing. Given that these strips form part of the proposed drainage strategy, what measures would be in place to stop livestock from grazing/removing the strips?</p>
1.10.12	Applicant	<p>Localised flood events</p> <p>At OFH1, Mr Stuart Thompson provided oral evidence on flood damage to properties in Elms Road in September 2024 as well as flooding across the A40 and A4095. Please explain what drainage measures would be in place in proximity to these areas and how the proposed development would mitigate flood issues in the vicinity.</p>
1.10.13	Applicant	<p>Assessment of groundwater and surface water flood risk in Cumnor Parish</p> <p>Please provide bespoke comments on the flood risk report prepared by GWP Consultants LLP on behalf of Cumnor Parish Council, submitted at DL1.</p>
1.10.14	Applicant	<p>Preliminary Floor Risk and Drainage Appraisal – Worton Park</p> <p>Please provide bespoke comments on the flood risk report prepared by RSK Land and Development Engineering Ltd on behalf of Worton Park, submitted at DL1.</p>
Hydrology and Groundwater		
1.10.15	Applicant	<p>Drainage layout</p> <p>Please signpost to detailed information in respect of a drainage layout for the proposed development. If not available, please submit a detailed drainage layout with identified discharge locations and, where necessary, updated water quality and maintenance requirements.</p> <p>Please also confirm how the field beneath the solar panels will be managed during construction, operation and reinstatement.</p>
1.10.16	Environment Agency	<p>Water Framework Directive (WFD)</p> <p>Are you content with all aspects of the WFD assessment [APP-174] and are you satisfied with the conclusions reached therein?</p>

Rivers and watercourses		
1.10.17	Applicant	<p>Prevention of pollution</p> <p>The ExA request to see details of a bentonite breakout plan so as to appreciate both the risk of potential leakages of bentonite into major and ordinary watercourses, and the processes for subsequent management.</p>
Control of pollution and contaminants		
1.10.18	Applicant	<p>Impacts from ground contamination on future site users</p> <p>Paragraph 11.9.19 of ES Chapter 11 [APP-048] discusses operation and maintenance effects in respect of impacts from ground contamination on future site users. However, no significance of effect is detailed at paragraph 11.9.19.</p> <p>Please confirm whether this is an oversight and if so, amend accordingly.</p>

Q1.11. Geology and Land Use		
Farming Operations		
1.11.1	Applicant	<p>Loss of agricultural land</p> <p>Paragraph 5.11.12 of NPS EN-1 states “<i>Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)</i>”.</p> <p>Please explain how the test in paragraph 5.11.12 of NPS EN-1 is satisfied in respect of the Proposed Development?</p>
1.11.2	Applicant	<p>Conservation grazing</p> <p>Paragraph 15.9.110 of ES Chapter 15 [APP-052] confirms that sheep grazing is proposed to take place on 835.5ha of land and that this would equate to approximately 3,354 sheep grazing the solar areas of the site.</p> <p>It is noted that the wider Blenheim Estate includes a sheep flock of approximately 1,000 ewes which produce approximately 1,700 lambs each year. However, please confirm whether the Applicant will be purchasing and supplying the sheep for the grazing?</p> <p>If not, has the cost to the affected land holdings been factored into the socioeconomic assessment?</p>
1.11.3	Applicant	<p>Conservation grazing</p> <p>Noting the content of paragraph 9.7.2 of the oSMP [APP-233], please confirm if conservation grazing would take place immediately following the installation of the solar panels or would there be a delay whilst waiting for the cultivation of suitable land?</p> <p>If a delay is anticipated, please confirm the duration of such a delay.</p> <p>Please also confirm what actions would be taken if the cultivation of suitable grass land fails?</p>
1.11.4	Applicant	<p>Agricultural Land Classification (ALC) and soil survey</p> <p>Paragraph 17.4.9 of ES Chapter 17: Agricultural Land Use of Public Rights of Way [APP-054] states that, due to dry soil conditions, some areas or crop conditions were not included in the survey.</p>

		<p>It is noted from Table 17.17 [APP-054] and paragraph 9.3.4 of the Outline Soil Management Plan (oSMP) [APP-233] that 67 hectares (ha) of agricultural land was not surveyed. Given the scale of this surveyed agricultural land, could the exclusion of these areas have resulted in inaccurate assessment findings?</p> <p>When is it anticipated that such survey work would be undertaken?</p>
1.11.5	Applicant	<p>Land Classification</p> <p>Please set out in detail the methodology used for land classification, including information such as the number and types of samples or from where pre-existing data was sourced from. Additionally, please provide the current qualification and experience of the author of the classification survey.</p>
1.11.6	Applicant	<p>Land holding details</p> <p>For each of the 10 agricultural land holdings, please either signpost to the below information or provide the following information in a tabular format:</p> <ol style="list-style-type: none"> 1) Name and address of holding 2) Relevant plot number 3) Total size of holding 4) Holding use 5) Breakdown of land classification – by hectare and percentage of holding 6) Summary of proposed project activity on holding 7) Loss of land – defined by temporary and/ or permanent by both hectare and percentage of holding
1.11.7	Applicant	<p>Best and Most Versatile Land (BMV)</p> <p>The ExA are concerned that, despite the Planning Inspectorate's requests [APP-054, Table 17.4], the operational and decommissioning impacts on BMV land have been scoped out of the assessment. The reasons given in Table 17.7 do not appear to offer much reassurance in this regard.</p> <ol style="list-style-type: none"> 1) Please confirm the proportion of BMV land would be unavailable for current farming activities during the Proposed Development's operational lifespan.

		2) Please explain your assertion in Table 17.7, which states “ <i>On this basis, the temporary and permanent loss of best and most versatile land during operation and maintenance of the Project is unlikely to result in likely significant effects</i> ”, when BMV land is directly linked to crops and crop growth. Would there not be a significant effect on the ability for those affected farms to grow crops for an extended period of time?
1.11.8	Applicant	Best and Most Versatile Land Please provide in a tabular format, the areas of land in each land classification across the Proposed Development. Please provide specific justification for the use of land by grade.
1.11.9	Applicant	Grassland conversion and management Limited detail is provided with Chapter 17 of the ES [APP-054] in respect of how the proposed land would be converted from arable to grassland and the management of such land during the operational phase of the Proposed Development. Please provide further detail in respect of these matters.
1.11.10	Applicant	Animal Wellbeing What consideration has been given to the effect on the health and wellbeing of animals housed or grazing close to the Proposed Development i.e. effects due to noise and dust? What, if any, measures are necessary to mitigate effects and how will these be secured?
1.11.11	Blenheim Estate	Agricultural Land Yield Noting the content of your (DL1 submission, please confirm which parcels of agricultural land proposed to be included within the Proposed Development are degraded of nutritional and organic content. Please identify each parcel of affected land/soil on a plan.
Other land use matters		
1.11.12	All local authorities	Green Belt – definition of openness At paragraph 8.3.20 of Appendix 8 to the Planning Statement [APP-225], the Applicant notes that the NPPF does not provide a definition of ‘openness’. However, the Applicant, for the purposes of the Planning Statement, defines openness “ <i>in the context of the amount of the spatial presence or footprint of the development i.e. the extent of the physical presence of the development in the landscape in a two-dimensional sense i.e. from a birds eye or aerial view. Secondly, the visual impact of the development is also</i>

		<p><i>important and capable of being factored into the test of openness i.e. the degree to which the development can be seen from public vantage points and the effect of landscaping and the screening function that performs and affects what can be seen”.</i></p> <p>Please confirm whether this definition is considered acceptable. If not, please provide a detailed justification and alternative definition.</p>
1.11.13	Cherwell District Council	<p>Green Belt – The Cherwell Green Belt Study 2023</p> <p>Reference was made to The Cherwell Green Belt Study 2023 in your RR [RR-0164]. Please submit a copy of this study into the Examination.</p>
1.11.14	Applicant	<p>Green Belt – Alternatives</p> <p>In [RR-0164] Cherwell District Council question why the proposed location of the solar panels had been amended to omit areas of archaeological interest and to allow for sky lark plots but did not preserve those areas of land which were found to be of a higher quality agricultural grade.</p> <p>Please provide a detailed justification as to why panels located on Grade 2 and 3a quality land have not been removed and/or relocated.</p>
1.11.15	Applicant	<p>Green Belt and BMV considerations</p> <p>If the National Grid substation is located outside of the Order limits, the Applicant proposes to utilise the vacated 3.8ha of land to position more solar panels. This raises a couple of questions:</p> <ol style="list-style-type: none"> 1) The solar yield of 840MW was calculated on the basis of the national grid substation being provide with the Order limits. What would the additional yield be for the 3.8ha? 2) The ALC classification map [APP-110] shows that the land vacated by the National Grid substation comprises Grade 2 and Grade 3a agricultural land. Provide to the ExA a balancing exercise, balancing the additional yield (defined in response to question 1) versus the harms occurring to the BMV. 3) Set out the very special circumstances that would justify the construction of additional solar panels on the land vacated by the national grid substation.
1.11.16	Applicant	<p>Green Belt – Very Special Circumstances</p> <p>The ExA recognise that, as of current policy and practice, the delivery of community benefits is optional and voluntary. Indeed, the Applicant notes that the benefits proposed are not required</p>

		<p>to mitigate the impacts of the Proposed Development. However, the Applicant has sought to rely on VSC5 in making the case for very special circumstances. To this end, the ExA raises the following questions.</p> <ol style="list-style-type: none"> 1) If you are not relying on community benefits to mitigate the project or in the overall planning balance, why can you rely on them to substantiate a Green Belt case? 2) If you are not relying on the community benefits, specifically the educational and agricultural related initiatives in the planning balance, what is the compelling case for the compulsory acquisition of that land? 3) In paragraph 8.4.73 of the Green Belt case, it is stated: “<i>The Community Fund will be delivered as part of a Community Benefits Package agreed outside the scope of the DCO application, with relevant local authorities.</i>” Whilst this is acknowledged, the fact that the Applicant is relying on this (and other) measures to make a case for very special circumstances means the ExA is entitled to examine the matter. The ExA request evidence, during the Examination, that such community benefits have indeed been secured, otherwise confidence in such measures would potentially be low.
1.11.17	Applicant	<p>Green Belt – weighting to be given to the very special circumstances</p> <p>In considering very special circumstances, the ExA are aware that this does not prevent commonplace (i.e. not rare) being relied upon. However, the word "special" connotes not a quantitative test, but a qualitative judgment as to the weight to be given to the particular factor for planning purposes. In respect of VSC2, VSC4 and VSC6 (though not limited just to these if the Applicant wishes to respond further), explain in greater detail the weight to be given to each aspect and how 'quality' influences the weighting. How can that 'quality' be ensured and secured in either the dDCO or its accompanying management and monitoring plans?</p>
1.11.18	Applicant	<p>Not inappropriate development</p> <p>Paragraph 8.3.14 in Appendix 8 to the Planning Statement [APP-225] implies that structures to maintain agricultural use of the land would fall under the category of ‘<i>not inappropriate</i>’ development. Whilst an example is given of sheep and cattle pens, there appears to be no limitation on this in either the DCO or the controlling management plans. The OLEMP [APP-235], at paragraph 7.2.4 only, refers to grazing infrastructure.</p> <ol style="list-style-type: none"> 1) What powers in the DCO allow the Applicant to construct or deliver ‘grazing infrastructure’?

		<p>2) Define what is meant by 'grazing infrastructure'?</p> <p>3) What would avoid a proliferation of barns and buildings, claimed to be structures for maintaining agricultural use, as a result of the Proposed Development?</p>
1.11.19	Applicant	<p>Green Belt – Begbroke and Kidlington gap</p> <p>In relation to the Cherwell District Council DL1 submission, please confirm whether consideration was given to the gap between Begbroke and Kidlington within the Green Belt assessment?</p> <p>If not, please explain why.</p>
1.11.20	Vale of White Horse District Council	<p>Green Belt – NGET substation location</p> <p>In relation to your WR at DL1, in respect of the proposed NGET substation, please identify the location of land with a lower value of classification which is referred to.</p>
1.11.21	Applicant	<p>Temporary field compounds</p> <p>Paragraph 6.3.6 of ES Chapter 6: Project Description [APP-043] states that the satellite field compounds are to be either be returned to their previous use upon the completion of construction or used for solar installations.</p> <ol style="list-style-type: none"> 1) How and when will this decision be made? 2) In the design parameters used for the worst-case scenarios, is the assumption that these areas of land would be used for solar installation? 3) If such a decision hasn't been made to date, what implications would this potentially have on the worst-case scenarios used for the assessments?
1.11.22	Applicant	<p>Soil Management Plan – mixing of soils</p> <p>What documentation and physical control measures would be put in place to prevent accidental mixing of soils? How would these measures be secured through the dDCO?</p>
1.11.23	Applicant	<p>Soil Management Plan - stockpiles</p> <p>How would the suitability of soil stockpiles for restoration be assessed? Please confirm whether the final SMP would include a restoration methodology?</p>
1.11.24	Applicant	<p>Soil Management Plan – stockpiles</p> <p>Please confirm if stockpiled soils are to be labelled and protected from trafficking and damage? Is it proposed to seed soil stockpiles in place for more than 6 months?</p>

1.11.25	Applicant	Soil Management Plan - labelling Noting the content of Natural England's DL1 submission, please confirm if areas of the proposed development which are not to be stripped or used for stockpiling, haul routes or compounds are to be clearly marked by signs and barrier tape and protected from traffic and construction?
1.11.26	Applicant	Soil Management Plan – Audit Please confirm whether the final SMP would be subject to any internal compliance audits? If so, would the SMP be reviewed and updated as necessary? Please provide detail in respect of this process.
1.11.27	Applicant	Soil Management Plan – Reinstatement Please confirm why the oSMP does not include measures to return hardstanding to agricultural use?
1.11.28	All local authorities	Soil Management Approach Local authorities are asked whether the approach and content of the oSMP [APP-233] in respect of the management of potential effects on soil resources is appropriate? If not, please detail additional methods and/ or mitigation measures considered necessary.
1.11.29	Applicant	Soil Survey – Cable Corridor Route Noting the content of table 17.5 of ES Chapter 17 [APP-054] and also Natural England's DL1 submission, please confirm if it is proposed to undertake soil surveys along the proposed cable corridor route(s)? If not, what consideration has been given to the inclusion of such a survey into the oSMP [APP-233]?

Q1.12. Habitats Regulation Assessment		
Effect of the Proposed Development on its own and In-combination with Other Plans and Projects		
1.12.1	Applicant Natural England	<p>Piling in the HRA</p> <p>The project is anticipated to require 1.6 million piled foundations to install the solar arrays. However, the impact of such piles on identified European sites in the HRA (either via noise, disturbance or potential effects to water quality) do not feature in the HRA.</p> <p>Explain why piling is not considered as a potential pathway and has not been screened into the appropriate assessment.</p>
1.12.2	Applicant Natural England	<p>Thresholds for assessment</p> <p>In paragraph 4.4.10 of the HRA, the heavy goods vehicle (HGV) Average Annual Daily Traffic (AADT) threshold of 200 vehicles is said not to be breached in either project alone (125) or in-combination (192) scenarios.</p> <ol style="list-style-type: none"> 1) For clarity, can it be set out why vehicle numbers and not vehicle movements are the relied measurement here? 2) Assuming two-way movements, would 125 vehicles equate to 250 movements, thus exceeding the AADT threshold? 3) Should the Applicant, Natural England and the ExA take a precautionary assessment approach regarding the in-combination assessment given that the AADT of 192 is very close to the 200-vehicle threshold, and it would not take much change in future vehicle trips for that threshold to be exceeded?
1.12.3	Natural England	<p>Site Improvement Plans</p> <p>In the opinion of Natural England, would the project (alone or in-combination) lead to any impediment to the delivery of the Site Improvement Plans cited in the HRA and, if so, how?</p>
1.12.4	Applicant Natural England	<p>Unforeseen consequences</p> <p>In ES Chapter 9, the Applicant proposes the creation of circa 100 ha of new floodplain meadow as part of the River Evenlode enhancement corridor. Although deemed by the Applicant to be beneficial, would this have any consequence on the hydrological environment for either the Oxford Meadows or Cothill Fen Special Areas of Conservation (SAC) by, for example, causing those sites to become drier through an earlier uptake of water?</p>

1.12.5	Applicant Natural England	<p>Construction Noise</p> <p>In ES Chapter 13, the impact of pile driving is set out in table 13.25. In that table, it predicts a high impact for receptors less than 1,344 metres away from the source. However, in the HRA, it is stated there would not be any discernible impact on designated wildlife sites from construction noise in general because such sites are over 0.97km from the Order limits. The two do not seem to tally. Explain the situation and whether the action of percussive piling would have any effect on wildlife interests in the study area.</p>
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Q1.13. Health and wellbeing		
Social health impacts		
1.13.1	Applicant	<p>Human Health Study Area</p> <p>In their Relevant Representation (RR), Oxford City Council [AS-032] questioned the rationale not to include Launton and Otmoor ward in the assessment, which have residences within 1km of the Proposed Development.</p> <p>Please explain the rationale as to why this ward was not included in the assessment.</p>
1.13.2	Applicant	<p>Impacts on schools and school children</p> <p>In their submission, Oxford City Council [AS-032] raised concern over the apparent lack of assessment of potential glint and glare effects on the following schools and associated playing areas:</p> <ul style="list-style-type: none"> • Yarnton Preschool • William Fletcher Primary School • Cumnor C of E Primary School <p>1) Please confirm whether the above receptors, and educational establishments in general, were included within the assessment and if not, please provide a detailed justification.</p> <p>2) Additionally, please confirm whether educational establishments were specifically considered in noise, dust and EMF assessments? If not, please provide a detailed justification.</p>
1.13.3	Applicant	<p>Climate change and adaptation</p> <p>Paragraph 16.4.3 of ES Chapter 16 [APP-053] lists the determinants which have been scoped in and assessed, this includes climate change and adaption. However, Table 1-5 of Appendix 16.1: Human Health Consultation and Engagement [APP-219] confirms that during the construction and decommissioning phases, this issue has been scoped out.</p> <p>Please clarify whether this is an error in Table 1-5 [APP-219].</p>
1.13.4	Applicant	<p>Community food growing areas</p>

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		<p>Paragraph 16.9.17 of ES Chapter 16 [APP-053] states that the community food growing areas would benefit vulnerable groups and provide training to support growers, provide education opportunities for children and support mental and physical health benefits. As such, the implementation of these areas is stated as supporting positive health outcomes.</p> <p>Given the lack of information provided in respect of the proposed growing areas, for example location and how the areas would function, it is unclear how the above conclusions have been reached. Please provide additional detail to support the above conclusions.</p>
1.13.5	Applicant	<p>Cycle route connectivity</p> <p>It is noted at paragraph 16.9.79 of ES Chapter 16 [APP-053] that the matter of connectivity of cycle routes is likely to be a matter of post-submission discussion and as such, limited benefit has been assigned to this effect.</p> <p>Please explain why this issue is to be discussed post-consent rather than during the Examination and whether it is anticipated that connectivity may be reduced following future discussions.</p>
1.13.6	Applicant	<p>Cumulative effects assessment – open space, leisure and play</p> <p>Please review the last sentence of paragraph 16.11.15 of ES Chapter 16 [APP-053] and confirm whether an additional ‘not’ has been included in error.</p>
1.13.7	Oxfordshire County Council	<p>Health Impact Assessment</p> <p>Taking into consideration both the content of ES Chapter 16 [APP-053] and Appendix 16.2 Oxfordshire HIA Toolkit Alignment Review [APP-220], please confirm whether you are fully satisfied that the Applicant has had full regard to the Oxfordshire Health Impact Assessment Toolkit. If not, please provide a detailed justification</p>

Q1.14. Landscape Resource and Visual Amenity		
Landscape and Visual Errata and Methodology		
1.14.1	Applicant	<p>Photomontages [APP-079] - errata</p> <p>Please see question 1.6.2. Also relevant to this section.</p>
1.14.2	Applicant	<p>Landscape and Visual Impact Assessment (LVIA) [PDB-006] - errata</p> <p>The ExA believe there are discrepancies and inconsistencies in the documentation, making navigation confusing. The following paragraphs should be resolved or, if correct, an explanation given.</p> <ul style="list-style-type: none"> • 8.6.7: Should this refer to Fig 8.244? [APP-068] • 8.6.8: Should this refer to Fig 8.245? [APP-069] • 8.6.10: Should this refer to Fig 8.247? [APP-071] • 8.6.12: Should the quoted Figure numbers refer to Representative Viewpoints? • 8.6.17: Figure 130 is a photograph, and the reference is therefore incorrect. <p>Please check Figure references throughout this document and also ensure figures are correctly labelled.</p>
1.14.3	Applicant	<p>Views from Outdoor Recreational Facilities - errata</p> <p>Paragraphs 8.66 to 8.69 of the ES [PDB-006] appear to have some text missing relating to other recreational facilities. Provide any text necessary.</p>
1.14.4	Applicant	<p>Residential Visual Amenity Assessment (RVAA)</p> <p>ES Chapter 8 [PDB-006] Table 8.5 shows that the Scoping Opinion required assessment for RVAA. Paragraphs 8.6.78 to 8.6.80 of this document refer to RVAA. However, the very brief paragraphs do not clearly demonstrate that the 4-step assessment suggested in The Landscape Institute Technical Guidance Note TGN 2/19 has been undertaken.</p> <p>Provide a more in-depth assessment in accordance with TGN 2/19, including;</p> <ul style="list-style-type: none"> • Step 1 – Define the study area and identify the properties to be assessed; • Step 2 – Evaluate the baseline visual amenity of these properties; • Step 3 – Assess the likely change to this baseline and identify of which properties requiring further assessment;

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		<ul style="list-style-type: none"> Step 4 - Detailed further assessment of the individual properties identified in step 3 as having the greatest magnitude of change such that the Residential Visual Amenity Threshold may be engaged.
1.14.5	Applicant	<p>Methodology relating to duration and reversibility</p> <p>[PDB-006] paragraph 8.5.9 notes the categorisation for duration and reversibility taken from Guidelines for Landscape and Visual Impact Assessment, third edition (GLVIA), paragraph 5.51 and 5.52. GLVIA makes it clear that appraisals should make the parameters for both duration and reversibility clear and justified.</p> <p>Neither duration nor reversibility parameters are assessed or justified in the LVIA.</p> <p>In light of the wording of GLVIA and the consideration of reversibility within, for example, a generation, justify your reasonings for considering the Project fully reversible.</p>
1.14.6	All local authorities	<p>Viewpoints and Photomontages</p> <p>Notwithstanding any consultations already received, are you happy with the number, range and direction of views provided and also with the number and range of photomontages? If not, please indicate the location and direction of other views that you feel are important, or if already provided at DL1, please signpost these.</p>
1.14.7	Applicant	<p>Scope of assessment</p> <p>The Landscape, Ecology and Amenities Plan [APP-228] for the southern site area shows the land proposed for the National Grid substation and the project substation/main substation as being areas of proposed grassland not beneath the solar arrays.</p> <p>Whilst it is appreciated that the Proposed Landscape Elements are indicative, the key to the plan indicates these areas would help deliver Biodiversity Net Gain (BNG). The land cannot serve two purposes. Update the plans to more accurately reflect the proposals and, if necessary, recalculate the BNG.</p>
1.14.8	Applicant	<p>Lighting</p> <p>Table 8.5 of the ES [PDB-006] contains details of the Planning Inspectorate's concern regarding lighting and the impacts at night-time. The Applicant's brief sentence about this in Table 8.5 does not provide adequate justification for scoping such a matter out of the ES. Provide greater detail as to why it is felt night-time impacts would not be observed for this project.</p>

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1.14.9	Applicant	<p>Suggested areas to be omitted from the Proposed Development</p> <p>Several submissions at DL1 proposed areas that should exclude panels, for a variety of reasons. These omissions were shown either as marked-up plans or as suggested field numbers within the text of their submissions.</p> <p>Provide a plan with all these omissions shown as overlays, with each layer being identified with the name of the proposer.</p> <p>This plan should include the suggestions from:</p> <ul style="list-style-type: none"> • ICOMOS • Historic England • The local authorities • Oxford Airport
1.14.10	Applicant	<p>Levels of Significance in LVIA Methodology</p> <p>At ISH1 the ExA asked a question (Agenda Item 3g) regarding why effects with a significance level of Moderate for less were considered not to be significant.</p> <p>There was some discussion on this point and Mr Lilley stated that including Moderate effects as significant would have led to a disproportionate level of significant effects.</p> <p>In their response to Action Point 18, submitted at DL1, Oxfordshire County Council listed 9 previous solar farm NSIP developments, all of which were smaller in capacity to Botley West and all of which noted some major and moderate landscape impacts. These impacts were documented and considered in a reasoned and justified way during their examinations.</p> <p>In light of these examples, the ExA requires the applicant to draw out key similarities and/ or differences with the aforementioned projects, with the overall objective to substantiate the applicant's position as to why it has deemed a moderate effect not to be significant.</p>
Landscape Effects		
1.14.11	Applicant	<p>Landscape effects - Construction</p> <p>Table 8.15 [PDB-006] indicates the sensitivity of landscape character areas, with most being medium to high or high sensitivity. Paragraphs 8.9.3 – 8.9.9 provide the assessment of effects during the construction phase that concludes, overall, minor adverse effects.</p>

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		<p>According to the definition of significance of effects matrix at Table 8.13, a minor effect is described as “<i>Where proposed changes would be at slight variance with the character of an area.</i>”</p> <p>From the USI’s and reading the submissions at DL1 it would appear that the assessment of a minor adverse effect during construction, bearing in mind the scale of the project being over 839ha of undulating land, does not wholly seem justified.</p> <p>Explain in more detail how the assessment of minor adverse effect is justified, particularly in relation to the how the scale of construction across the proposed development site may be considered as only a “slight variance” with the existing character.</p>
1.14.12	Applicant	<p>Landscape Effects – Operation</p> <p>In relation to the operation and maintenance phase, a moderate adverse effect is concluded at year 1 and minor adverse effect concluded at year 15.</p> <p>According to the definition of significance of effects matrix at Table 8.13, a moderate effect is described as “<i>Where proposed changes would be noticeably out of scale or at odds with the character of an area</i>” and a minor effect is described as “<i>Where proposed changes would be at slight variance with the character of an area.</i>”</p> <p>In light of this, taking into account representations in many of the RR’s, as well as at OFH1, OFH2 and ISH1, and the WR’s received at DL1, the ExA require explanation as to how operational effects have been adjudged to be as low as they have been.</p> <p>Explain in more detail how the assessment of moderate/minor adverse effect is justified, particularly in relation to the change in character of the landscape from rural to industrial.</p>
Visual effects		
1.14.13	Applicant	<p>Residential Properties</p> <p>ES Chapter 8 [PDB-006] Table 8.18 indicates that Occupiers of Residential Properties form a “Key Receptor taken forward to assessment”, with a high sensitivity rating.</p> <p>Under Section 9, - Assessment of Effects, there is no reference to this Key Receptor group. Please update this document with the required assessment.</p> <p>See also Q.1.14.4 regarding RVAA.</p>

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1.14.14	Applicant	<p>Visual effects - Construction</p> <p>Table 8.18 identifies the key visual receptors taken forward into the assessment with most being high sensitivity.</p> <p>Paragraphs 8.9.21 – 8.9.41 provide the assessment of effects during the construction phase on visual receptors, excluding the representative viewpoints. These assessments conclude a moderate or minor adverse effect.</p> <p>According to the definition of significance of effects matrix at Table 8.13, a moderate effect is described as <i>“Where proposed changes to views would be noticeably out of scale or at odds with the existing view.”</i> and a minor effect is described as <i>“Where proposed changes to views, although discernible, would only be at slight variance with the existing view”</i></p> <p>Explain in more detail how the assessment of moderate or minor adverse effect is justified, particularly in relation to the scale of construction across the proposed development site.</p>
1.14.15	Applicant	<p>Visual Effects – Operation</p> <p>In relation to the operation and maintenance phase, paragraphs 8.9.118 to 8.9.141 provide the assessment of effects during the operation phase on visual receptors for years 1 and 15, excluding the representative viewpoints. These assessments conclude a moderate or minor adverse effect, although at paragraph 8.9.121 a major adverse effect is concluded but this is still considered not significant.</p> <p>According to the definition of significance of effects matrix at Table 8.13, a moderate effect is described as <i>“Where proposed changes to views would be noticeably out of scale or at odds with the existing view.”</i> and a minor effect is described as <i>“Where proposed changes to views, although discernible, would only be at slight variance with the existing view”</i></p> <p>Explain in more detail how the assessment of moderate/minor adverse effect is justified, particularly in relation to the noticeable visual changes to the views.</p>
1.14.16	Applicant	<p>Retention of hedgerows following decommissioning</p> <p>At ISH1, under Agenda item 3d (greenbelt), the ExA asked whether it was the intention to retain hedgerows that has been planted as screening for the development.</p> <p>The applicant responded that the hedgerows, as well as other planting would remain as a “landscape legacy” and would not be removed at decommissioning.</p>

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		<p>Whilst the benefits can be appreciated in terms of biodiversity and ecology, there could be disadvantages in terms of the permanent change to the open views that are currently experienced, and the potential for not returning the land to its current state.</p> <p>Provide details on how this potential conflict could be managed.</p>
1.14.17	Applicant	<p>Arboricultural Report Update</p> <p>It is noted in your DL1 submission “Written Summary of its oral submissions at ISH1” that due to land access issue approximately 10% of the missing areas were not able to be surveyed. Please provide a simple plan showing the areas that have not been surveyed so that the ExA may consider whether these assessments are required.</p>

Q1.15. Noise and Vibration		
Noise effects		
1.15.1	All Local Authorities	<p>Local Authority views on applicant's assessment and conclusion</p> <p>Paragraph 13.14.4 of ES chapter 13 [APP-050], when referring to noise and vibration impacts states "Overall, it is concluded that there will be no significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases".</p> <p>Local Authorities are asked to please state whether they agree with the assessment methodology and conclusions set out in ES Chapter 13 Noise and Vibration [APP-050]. If not, please explain where you disagree and why.</p>
1.15.2	Applicant	<p>Derivation of operational noise model output figures</p> <p>Can the applicant explain how the figures specified in Annex B of Appendix 13.3 Operational Phase Noise [APP-213], were derived, including why the difference between Rating Sound Level and Background Sound Level is negative on occasions.</p>
1.15.3	Applicant	<p>Noise nuisance level calculations/ assumptions</p> <p>In Appendix B of Appendix 13.3 Operational Phase Noise [APP-213], the magnitude of impact is calculated to be low at Jumpers Farm, how can the applicant be sure that even at these levels it will not cause a nuisance to receptors at this location.</p>
1.15.4	Applicant	<p>Exceedance of set noise limits</p> <p>At ISH1, the Applicant explained that should any noise limits set by the applicant be exceeded, an investigation into the cause would take place. Can the Applicant confirm if this investigation procedure will form part of the operational management plan that is to be agreed with local authorities.</p>
1.15.5	Applicant	<p>Noise reflection</p> <p>As part of their noise impact assessment, has the applicant taken noise reflection from the solar panels into consideration, including both noises generated by the proposed development itself and also existing noise sources which the panels could potentially amplify at certain receptors? If yes, what was the conclusion reached. If not, why not?</p>

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1.15.6	Applicant	<p>Noise nuisance and distance</p> <p>The level of noise which may cause nuisance varies for individuals, with some sectors of society particularly susceptible to noise pollution than others. How has the applicant determined what the level of noise needs to be, above which nuisance to a group or individual maybe caused? Following this how was the corresponding distance beyond which noise levels are sufficiently low to not cause nuisance, calculated.</p>
1.15.7	Applicant	<p>Missing data</p> <p>There appears to be limited data entries in Table 13.21 [APP-050] in respect of ST1, ST2 and ST3. Why were these locations only chosen for short-term monitoring, and with whom was the timing of the monitoring agreed?</p>
1.15.8	Applicant	<p>Exposure to noise</p> <p>Paragraph 13.9.11 [APP-050] suggests piling would not cause a harmful effect because it would be near a receptor for a short time only. Define what a 'short time' looks like in terms of hours and days.</p>
1.15.9	Applicant	<p>Links and noise</p> <p>Paragraph 13.9.52 [APP-050] suggests construction traffic noise would not significantly increase noise levels. That appears to overlook that some links are having over 100% increase in heavy good vehicles. Explain your position, with reasons.</p>
1.15.10	Applicant	<p>Outside of construction hours</p> <p>Embedded mitigation measure 13.2 in table 13.24 of ES Chapter 13 [APP-050], states <i>'Construction hours will be set out in the Outline CoCP [EN010147/APP/7.6.1] and secured through the DCO and agreed with relevant stakeholders.'</i></p> <p>Has the Applicant considered the following:</p> <ol style="list-style-type: none"> 1) any periods of construction activity which may need to fall beyond the normal construction hours and how has this been factored into the noise assessment/modelling? 2) should work outside of these hours ever be necessary, how will the Applicant seek to gain approval of this from relevant authorities and how would this process be secured in the dDCO?

Vibration effects		
1.15.11		There are no questions on this topic at this time. Questions may be asked in future Hearings or in further written questions.

Q1.16. Socio-Economic Effects		
Socio-economic Impacts		
1.16.1	Applicant	<p>Tourism and recreation employment</p> <p>What percentage of employment relates to the tourism and recreation sector in the Study Area?</p>
1.16.2	Applicant	<p>Assessment and census data</p> <p>Paragraphs 15.8.11 and 15.8.12 of ES Chapter 15 [APP-052] acknowledge a limitation in respect of the assessment in regard to the use of 2011 Census data. As the 2021 Census data is now readily available, please explain why the most up to date data wasn't used in respect of the baseline position.</p> <p>Given that 2021 Census data is available, and used within the Outline Skills, Supply Chain & Employment Plan (OSEP) [APP-218], please comment on whether the latest available data would have any implications for the results of the assessments undertaken?</p>
1.16.3	Applicant	<p>Net direct construction employment</p> <p>Paragraph 15.9.17 of ES Chapter 15 [APP-052] states that "...an overall net gain in direct employment as a result of the Project of 191 direct local FTE jobs".</p> <p>At paragraph 15.9.48 this figure is stated to be 199 direct local Full-Time Equivalent (FTE) construction jobs but paragraph 15.9.50 acknowledges the loss of 8 FTE jobs to the cessation of agricultural output. Please confirm whether the actual figure in respect of direct FTE jobs is 191?</p>
1.16.4	Applicant	<p>Net direct operation and maintenance employment</p> <p>Paragraph 15.9.31 of ES Chapter 15 [APP-052] states that the net total jobs created over the operational phase would equate to 18 direct local FTE jobs. Please clarify that this figure has also been used in the calculation of Gross Value Added (GVA) in paragraphs 15.9.55 to 15.9.59.</p>
1.16.5	Applicant	<p>Real term economic output</p> <p>Paragraph 15.9.59 of ES Chapter 15 [APP-052] states that the Proposed Development would equate to a real term economic output of £64.7. Please confirm whether this figure should state £64.7 million?</p>

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1.16.6	Applicant	<p>Improved skills and qualifications</p> <p>Paragraph 15.9.80 of ES Chapter 15 [APP-052] states that due to the early stage of development, information in respect of procurement strategies or employment profiles is not available. Furthermore, paragraph 15.9.85 also states that the specific skills and qualification opportunities are not fully known.</p> <p>Will this information be made available before the close the Examination?</p>
1.16.7	Applicant	<p>Blenheim Palace</p> <p>The ExA cannot readily see any detailed assessment of the impacts upon Blenheim Palace in terms of agricultural productivity or impacts on tourism, with consequential effects on viability. Provide this information.</p>
1.16.8	Applicant	<p>Community food growing areas</p> <p>Paragraph 15.9.100 of ES Chapter 15 [APP-052] confirms that an area of up to 30ha is to be provided for community food groups. Please confirm how the scale of this initiative was decided upon. What consultation with local stakeholders was undertaken in respect of making the decision in terms of scale.</p> <p>How is the delivery of this community initiative to be secured and what scale of food production is anticipated to be provided.</p> <p>The Project Mitigation Measures and Commitments Schedule [APP-129] states that the provision of such areas is additional mitigation. Given that limited information has been provided in respect of these areas, please confirm what weight should be given to this by the ExA.</p>
1.16.9	Applicant	<p>Community food growing areas</p> <p>At paragraph 8.4.71 of the Planning Statement [APP-225] (updated at DL1), it is stated that several local food growing companies have expressed interest in food growing initiatives on land within the Project Site. It is further noted that delivery of this initiative is to be established if the Proposed Development becomes operational.</p> <p>Please confirm whether it is intended to work towards draft agricultural licence agreements with interested local food growing companies prior to the close of the Examination and if so, provide an update. If not, please provide a detailed justification.</p>

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1.16.10	Applicant	<p>Outline Skills and Employment Plan - engagement</p> <p>The seven opportunities listed within the Outline Skills, Supply Chain and Employment Plan (OSEP) are noted [APP-218], alongside of Requirement 13 of the dDCO [AS-009] (updated at DL1) which states that “<i>No part of the authorised development may commence until a skills, supply chain and employment plan in relation to that part has been submitted to and approved by the relevant planning authority...</i>”.</p> <p>Please provide an update in terms of the summary of engagement to date (section 7.5 of the OSEP).</p>
1.16.11	Applicant	<p>Outline Skills and Employment Plan – GVA</p> <p>Paragraph 3.2.13 of the OSEP states that the construction GVA would equate to £17 million within the study area [APP-218]. In contrast, paragraph 15.9.50 of ES Chapter 15 [APP-052] states that the construction phase would result in a total net gain in GVA of approximately £16.4 million.</p> <p>Please confirm which figure is correct and make amendments to any submitted application documentation if necessary.</p>
1.16.12	Applicant	<p>Outline Skills and Employment Plan – agricultural sector</p> <p>Table 4.7 and paragraph 4.5.5 of the OSEP [APP-218] state that agriculture accounted for 0.5% of all employment. Table 15.10 and paragraphs 15.9.105 and 15.9.117 of ES Chapter 15 [APP-052] state that the number of people employed in farm-based agriculture accounted for 1.1% of employment in the Study Area.</p> <p>Please explain the difference in figures.</p>
1.16.13	Applicant	<p>Outline Skills and Employment Plan – Table 6.1</p> <p>Paragraph 6.3.1 of the OSEP [APP-218] states that Table 6.1 contains detail in respect of skills and disciplines required for the successful delivery of the Project. However, it appears that Table 6.1 contains detail regarding potential stakeholders for skills collaboration.</p> <p>Please confirm and amend if necessary.</p>
1.16.14	Applicant	<p>Outline Skills and Employment Plan – content</p> <p>The OSEP [APP-218], as drafted, appears to include a number of suggestions of possible opportunities and/or measures the Applicant may enter into. Examples of such wording include, but is not limited to, the following:</p>

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		<ul style="list-style-type: none"> Paragraph 6.3.5 states that '<i>...the Applicant will consider a programme to promote apprenticeships during the various phases of the Project.</i>' Paragraph 6.3.6 states that '<i>The Applicant will consider other interventions to support the training of employees and workers on the Project.</i>' Paragraph 6.3.17 states that '<i>The Applicant will consider setting up visitor and education programming near the for educational visits and technical exhibitions.</i>' Paragraph 6.4.9 states '<i>The Applicant could introduce initiatives to maximise the diversity of the workforce.</i>' <p>In order to enable the ExA to fully consider the content of the OSEP it would be beneficial if the OSEP could be amended to reflect those opportunities and/or measures that the Applicant is fully intending to engage in, rather than the provision of a list of possibilities. Please review and amend the OSEP as necessary. If no amendments are considered necessary, please provide a full explanation.</p>
1.16.15	All local authorities	<p>Outline Skills and Employment Plan – delivery</p> <p>Section 7 of the OSEP [APP-218] details how the Applicant proposed to deliver the fill SEP. Please comment on the content of this section, in particular the proposed roles, responsibilities and timelines.</p>
1.16.16	Applicant	<p>Outline Skills and Employment Plan – monitoring</p> <p>The content of section 8 of the OSEP [APP-218] is noted in respect of monitoring. However, there is no reference as to what actions would be necessary should the monitoring indicate that the full SEP had failed to deliver the potential outputs.</p> <p>Please review and amend where necessary. If no amendments are considered appropriate, please provide a full explanation.</p>
1.16.17	Applicant	<p>Full Time Equivalent Jobs</p> <p>Some minor inconsistencies have been noted regarding direct FTE jobs in the OSEP [APP-218] and ES Chapter 15 [APP-052]. For clarity, please provide detail of direct FTE jobs for both the construction and operation and maintenance phases of the Proposed Development in a tabular form. In terms of the operational jobs, please include agricultural employment gain.</p>

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1.16.18	Applicant	<p>Decommissioning – indirect jobs</p> <p>At paragraphs 15.9.39, 15.9.41, 15.9.66, 15.9.83, 15.9.160 of ES Chapter 15 [APP-052] and paragraph 3.2.22 of the OSEP [APP-218] it is stated that the likely number of indirect jobs in the supply chain would be reduced as there would be no requirement for the manufacturing of the solar panels. However, some indirect job creation associated with the recycling of panels and equipment is likely to offset this.</p> <p>Please provide details of the indirect job figures used to reach this conclusion.</p>
1.16.19	Applicant	<p>Community benefits</p> <p>Row 11 of Table 6.2 of ES Chapter 6: Project Description [APP-043] states that the delivery mechanisms for community benefits is detailed within ES Chapter 15 [APP-052]. Please signpost to where this information is located.</p>
1.16.20	Applicant	<p>Sand and gravel extraction</p> <p>Paragraph 11.6.30 of ES Chapter 11 [APP- 048] confirms that extraction of sand and gravel reserves with the Central Site Area and the cable route between the Central Site Area and Southern Site Area would not be possible during the construction phase.</p> <p>Has the potential effect of the cessation of such extractions been assessed in commercial terms?</p>
Effects on social infrastructure		
1.16.21	Applicant	<p>Education facility building</p> <p>Please confirm how the possible location for the education facility was selected? What level of consultation was undertaken with local stakeholders in respect of the possible location?</p> <p>The Outline Operational Management Plan [APP-234] confirms that further detail in respect of the education facility is to be set out in the detailed Operational Management Plan. Please confirm why such detail is to be confirmed post-consent, rather than during the Examination.</p> <p>The Project Mitigation Measures and Commitments Schedule [APP-129] states that the provision of such an education facility to be additional mitigation. Given that limited information</p>

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		has been provided in respect of this facility, please confirm what weight should be given to this by the ExA.
1.16.22	Applicant	Removal of the proposed retail electricity company Please provide a detailed explanation as to why the proposed retail electricity company has been removed from the list of community benefits.
1.16.23	Applicant	Additional mitigation Mitigation number 15.8 in Table 15.12 of ES Chapter 15 [APP-052] states that the monitoring of supply chain and employment records is an additional mitigation measure. Please expand on how such monitoring is considered to be additional mitigation.

Q1.17. Traffic and Transport		
Local Road Network		
1.17.1	Applicant	<p>Origin of construction staff</p> <p>Paragraphs 12.7.13-12.7.16 of ES Chapter 12 [APP-049], explain the movements of staff during the construction period. Can the applicant provide further explanation and justification for the statement in paragraph 12.7.16 'to ensure the assessment remains reasonable, the proportion of construction HGVs on any one highway link is capped at 100%'.</p>
1.17.2	Applicant	<p>Peak hour vehicle movements</p> <p>Table 12.23 of ES Chapter 12 [APP-049] refers to peak hour vehicle movements, provide a breakdown of how these figures were derived.</p>
1.17.3	Applicant	<p>Negligible impact evidence</p> <p>Provide evidence and justification for the statement in paragraph 12.9.20 of ES Chapter 12 [APP-049] 'It is generally recognised within the transport planning industry that vehicle movements of less than 30 per hour would create negligible impacts upon highway capacity and the operation of junctions/ highways'.</p>
1.17.4	Applicant	<p>Scoping response</p> <p>In Table 12.4 National Highways of ES Chapter 12 [APP-049] is quoted as saying 'we would recommend that the applicant contacts us to determine any requirements we may have for the scope of the TS', was this consultation carried out?</p>
1.17.5	Applicant	<p>Widening of roads during construction</p> <p>Paragraph 12.7.18 of ES Chapter 12 [APP-049] lists a number of roads to be widened to help with construction vehicle movement. In the case where roads will be widened on a temporary basis only, how can the applicant be sure the original width of the road will remain suitable for maintenance activities.</p>
1.17.6	Applicant	<p>HGV route</p> <p>A proposed route for HGV vehicles has been provided in Appendix A1 of the outline code of construction practice document [APP-232].</p>

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		<p>Can the applicant explain if on occasions would it be necessary to deviate from the proposed route? What instances do you envisage, where this could be the case? What would be the effects, how have you assessed those effects and how would you mitigate those effects?</p> <p>What management and enforcement procedures will you have in place, to ensure drivers do not use an alternative route, other than when there is a legitimate reason for doing so.</p>
1.17.7	Applicant	<p>Low sensitivity links</p> <p>When referring to the sensitivity of links 5 and 10, paragraphs 12.11.10, 12.11.14 and 12.11.20 of the cumulative impacts assessment of the ES Chapter 12 [APP-049], all state 'These links are deemed to be of low vulnerability, high recoverability and low value'. Can the applicant explain further what they mean by this statement and how they came to this conclusion.</p>
1.17.8	Applicant	<p>Impact due to access restrictions</p> <p>Can the applicant elaborate on what measures they will implement to ensure impacts on PROW, residential and business premises due to potential access restrictions, are minimised during cable route installation, when traffic management measures, may need to be implemented. Should this be the case, how has the applicant taken one way traffic flows into consideration as part of their assessment on traffic and transport.</p>
1.17.9	Applicant	<p>Glint and glare impacts on road traffic users</p> <p>Paragraph 7.6.1 of the Glint and Glare Assessment [APP-128], states 'A moderate impact has been predicted upon separate 0.3km and 0.1km sections of the B4027'. The paragraph then follows on by referring to the possibility of using fencing or vegetation as screening for mitigation purposes. How are either of these options secured in the dDCO?</p> <p>Section 9 of the assessment refers to dwellings, railways, road and aviation, as receptors, where vegetation has been specified as a possible means of mitigation for potential impacts. What assurances can the applicant provide that, should this form of mitigation be selected, it will be effective immediately with no reliance on plant growth which could take several years?</p>
1.17.10	All Local Authorities	<p>Transport Assessment (TA), methodology and conclusions</p> <p>Do Local Authorities agree with the methodology and conclusions reached as reported in the ES Chapter 12 [APP-049]? If not, please identify where issues arise and the reasons.</p>

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1.17.11	Oxfordshire County Council (OCC) and other local authorities	<p>Mitigation measures and securing these in the dDCO</p> <p>Do OCC agree with the mitigation and output from the Construction Traffic Management Plan (CTMP), as detailed in the Outline Code of Construction Practice - Part 1 [APP-232] and are they satisfied these are appropriately secured through the dDCO?</p>
1.17.12	Applicant	<p>Cable drums</p> <p>In Table 18.25 of ES Chapter 18, there is reference to cable drums being used. In this respect</p> <ol style="list-style-type: none"> 1) Would cable drums be delivered directly to a construction compound or to the location where cable jointing works would take place? 2) Would any cable jointing works take place within the highway and, if so, what method of traffic management would be used during the course of any such works? 3) Would the movement of large cable drums constitute an abnormal indivisible load? <p>If the answer to (2) above is yes, set out where such movements are accounted for either in the ES or the suite of management plans to be produced under the OCoCP.</p>
1.17.13	Applicant	<p>Scope of the Assessment</p> <p>Table 12.7 of ES Chapter 12 [APP-049] reports that operational traffic is scoped out of the assessment. In ES Chapter 14 [APP-051], Table 14.9 implies that, over the lifetime of the proposed development, all of the panels would need to be replaced at least once. Provide:</p> <ol style="list-style-type: none"> 1) details of whether panels would be replaced on masse or whether there would be piecemeal replacement over a number of years; 2) details of what vehicle movements are anticipated to be generated in order to facilitate the replacement (or effective reconstruction) of the solar farm after 25 years; and 3) in light of the two questions above, justification for scoping out operational and maintenance traffic.
1.17.14	Applicant	<p>Road condition assessments</p> <p>Paragraph 12.4.11 of ES Chapter 12 [APP-049] sets out the nature of site-specific surveys undertaken to inform the assessment. One item that is not reported relates to road condition surveys. Has there been any attempt to understand the condition of the local highways and their suitability for use by construction traffic?</p>

Deadline for responses is Deadline 2, 1 July 2025

1.17.15	Applicant	<p>Cumulative delays</p> <p>With reference to paragraph 12.9.13 of ES Chapter 12 [APP-049] in respect of driver delays, would there be the potential for cumulative driver delay effects to occur due to multiple works ongoing concurrently and, if so, has such been assessed?</p>
1.17.16	Oxfordshire County Council	<p>Permit Scheme</p> <p>The ExA welcome the Applicant's commitment to adhere to the Oxfordshire Permit Scheme for Road Works and Street Works. Does this commitment alleviate any concerns with regards the wording of Articles within the dDCO?</p>
1.17.17	Oxfordshire County Council	<p>Planned road improvements</p> <p>The Local Impact Report notifies of planned improvements to the A40 and B4449 interchange with a roundabout.</p> <ol style="list-style-type: none"> 1) Would protective provisions in the dDCO be a means to resolution for this issue, protecting the integrity of those works? 2) If the Applicant did require to interface with your planned works, would articles in the dDCO ensure the 'making good' of the situation? 3) Are there any other planned works the ExA should be aware of and, if so, should these appear in the cumulative assessments in respect of the traffic and transport chapter?
Strategic Road Network		
1.17.18	National Highways	<p>Integrated transport assessment</p> <p>In table 12.4 of the ES [APP-049] the applicant has responded to the response provided by National Highways (NH) by stating an integrated Transport Assessment has been provided as part of the assessment in this chapter. Is NH satisfied this meets their recommendation for the applicant to provide a Transport Statement (TS)?</p>
1.17.19	National Highways	<p>Impact assessment on A34</p> <p>Paras 12.7.5 - 12.7.9 of the ES [APP-049], explain that the origin of all construction traffic will be from the A34, do you agree with the methodology and the assessment carried out by the applicant of the potential impacts on this SRN due to construction as detailed in section 12.9 of the ES.</p>

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Public Rights of Way		
1.17.20	Local Authorities	<p>Diversions and re-provision</p> <p>Please specify whether the diversions proposed by the applicant, proposed and temporary, are suitably justified and would not place a greater burden upon a user for accessing the countryside.</p>
1.17.21	Local Authorities	<p>Quality of the rights of way</p> <p>Please provide a summary of the current quality and condition of the PRoW within your respective jurisdictions. Also provide details of the impact the construction and operation of the solar farm would have on each of those PRoW.</p>
1.17.22	Applicant	<p>Length of diversion</p> <p>Table 16.24 [APP-053] contains details of the footpath from Cassington to Yarnton and states a permanent diversion would be in place. Unless it is written somewhere else, the table does not specify the length of the consequent route. This is also true for the entry 'Cumnor.' Please explain.</p>
Air traffic and aviation safety		
1.17.23	Applicant	<p>Reduction in development area</p> <p>The submission from Oxford Aviation Services to the ExA [PDA-002, paragraph 3.3] mentions sharing the document referred to as Annex 1 with yourselves during the pre-application stage, in which they propose a reduction to the development area, by employing an exclusion zone. It appears, following the reading of the Oxford Aviation Services submission at DL1, that resolutions are being pursued</p> <ol style="list-style-type: none"> 1) If the agreed panel exclusion zone were to be followed through, what would the estimated impact be on the solar farm's energy yield? 2) When can the ExA expect a change request application?
1.17.24	Defence Infrastructure Organisation	<p>RAF Weston on the Green</p> <p>The contents of your written representation are noted. In respect of both glint and glare as well as bird strike, is there any evidence you can provide to demonstrate that the impacts do occur, our realistic consequences of the proposed development and would interfere with the safety of aircraft?</p>

Deadline for responses is Deadline 2, 1 July 2025

1.17.25	Applicant	Other examples of solar near airfields The ExA note the Technical Aerodrome Safeguarding Report and the appendices showing the proximity of other solar developments near airfields. At a cursory glance, most of the solar developments are around 1km or greater away from an airfield and, notably, very few panels are positioned at the end of runways on the approach. The ExA do not see how the examples justify the layout of the current proposed development. If the applicant decides not to follow through with the apparent agreement with Oxford Airport, further detail will be required.
1.17.26	Applicant	Environmental mitigation Explain how the OLEMP, landscape mitigation, ecological mitigation and the measures to deliver BNG would comply with NPS EN-1 paragraph 5.5.41 (bullet 1) given that almost all the development would fall within the 13km range specified.
1.17.27	Oxford Aviation Services Defence Infrastructure Organisation	Radar It is not altogether clear whether you concur with the applicant's views on the limited potential of effects of the proposed development on radar or communications, navigation and surveillance (CNS) infrastructure. Set out any concerns for these matters.
1.17.28	Applicant Oxford Aviation Services	Substations Is there a need for aviation safety lighting of any kind to be applied to any of the proposed substations?

Q1.18. Waste and Minerals		
Waste		
1.18.1	Applicant Environment Agency Local Authorities	Robustness of assessment ES Chapter 18 [APP-055] deals with waste and resources. Are there any concerns regarding the Applicant's assessment, assumptions or conclusions?
1.18.2	Applicant	Discrepancies or deficiencies in data Table 18.25 references material excavated from the secondary substations, but there are no figures given in respect of the project main substation or the National Grid substation. Provide the data or explain with reasons why such data is missing.
1.18.3	Applicant	Damaged goods If, for whatever reason, a solar panel or its supporting frame becomes damaged in anyway, would it be capable of being recycled or would such broken equipment go to landfill?
1.18.4	Applicant	Bill of Quantities The Applicant is requested to provide a bill of quantities for the resources required for the proposed development.
1.18.5	Applicant	Disposal In [RR-1104], the subject of Lithium-ion batteries is raised. Such components are not specified within ES Chapter 18, and the ExA have noted that ES Chapter 6 suggests battery storage would be elsewhere. Nonetheless, the ExA seek information as to the presence (or otherwise) of such potentially hazardous equipment and, ultimately, where disposal would occur.
Minerals		
1.18.6	Oxfordshire County Council	Mineral Resource Assessment (MRA) ES Chapter 18 at Table 18.5 reports that Oxfordshire County Council were recorded as reviewing the MRA and would provide a response in due course. The ExA would welcome the Council's detailed comments on the MRA at the earliest opportunity.

1.18.7	Oxfordshire County Council	Adverse effects on mineral resource The ExA note the concerns regarding sterilisation of the mineral resource and the length of time the resource would be inaccessible. In terms of piling works and the prospect for the applicant to leave cables in situ during decommissioning, are you concerned about potential damage to the mineral resource as well?
1.18.8	Applicant	Compliance with NPS EN-1 Set out clearly, for the SoS, how paragraph 5.11.19 has been met. Set out clearly, for the SoS, what mitigation measures under paragraph 5.11.28 are being pursued, other than simply the assertion that the development is 'temporary'.