Botley West Solar Farm

Applicant's Response to the ExA's First Written Questions

July 2025

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Planning Act 2008; The Infrastructure Planning (Examination Procedure) Rules 2010

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1. Introduction

1.1.1 This report responds to the Examining Authority's (ExA) first written questions, issued on 10 June 2025 **[PD-008].** It responds to each of the questions posed to the Applicant.

1.1.2 The Applicant has not responded to questions posed to specific Interested Parties, apart from clarifications provided on some questions;

1.1.3 1.6.9, 1.13.7, 1.14.6, 1.17.10, 1.17.11, and 1.17.16 to 1.17.19, intended to assist the ExA.

1.1.4 However, the Applicant will review further responses once available, and may comment on those at Deadline 3.

1.1.5 Section 2 of this report is tabularised to include the ExA's questions and a response to each question under the topics set out in the ExA first written questions **[PD-008]** as per the Table of Contents above.

2. APPLICANT'S RESPONSE TO EXA'S FIRST WRITTEN QUESTIONS (EXQ1)

2.1 Q1.1 General and Cross Topic Questions

ExQ1	Question to	Question	Applicant's Response
Planning Policy			
Q1.1.1	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.	The main updates to the NPPF, made in December 2024, that are relevant in relation to the development of the Project, pertain to Section 13, Protecting Green Belt land; specifically the introduction of the Golden Rules in regard to development located within the Green Belt, and the introduction of the Grey Belt – although the Applicant is not suggesting that any part of the Project Site is 'Grey Belt'. Due to the revisions, a number of paragraph numbers have also been amended. In light of the amendments to the NPPF, specifically in relation to the Green Belt, the National PPG was also updated in February 2025 to reflect these changes, and includes confirmation that 'villages are not towns' for the relevant purpose of Green Belts. The Applicant's responses on Green Belt issues are provided within the Applicant's responses to the ExA's Questions [**EN010147/APP/12.2**], and also in the Applicant's Response to Relevant Representations [**REP1-021**]. The The Applicant proposes that updates to the NPPF will be reflected in the NPPF Compliance Table (Appendix 7, Table 12) that is to be contained within an updated Planning Supporting Statement [**REP1-012**] for Deadline 6. In addition to commentary on Green Belt, the NPPF introduced Paragraph 163, which confirms that 'the need to mitigate and adapt to climate change should be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts'. The 2024 NPPF was also updated to incorporate support within the planning system to the transition to net zero (former paragraph 155 (NPPF, 2023), now paragraph 161 (NPPF, 2024). Paragraph 168 (NPPF, 2024) now requires that in

ExQ1	Question to	Question	Applicant's Response
			the determination of renewable and low carbon energy developments, 'significant weight to the benefits associated with renewable and low carbon energy generation, and the proposals contribution to a net zero future' (former paragraph 161, NPPF, 2023). The NPPF has provided further, reinforcing support for development that supports the transition to net zero and the drive to mitigate and adapt to the effect of climate change. Other updates to the NPPF include: • Sustainable Transport – Former Paragraph 108 (NPPF, 2023), now Paragraph 109 (NPPF, 2024) seeks for transport considerations to form part of early engagement with local communities. In regard to Botley West, whilst not a requirement at the time, details regarding potential highways impacts were produced as part of non-statutory and statutory consultation. The Consultation Report [**APP-024**] provides further details about the scope of information provided at those stages. • Climate Change and Community Health – Former paragraph 153 (NPPF, 2023), now paragraph 162 (NPPF, 2024) has included the requirement for policies to support appropriate measures to ensure the future health of communities, in relation to infrastructure to climate change impacts. In relation to the Botley West, the impact on Human Health has been considered at Volume 1, Chapter 16: Human Health [**APP-053**]. • Flood Risk – Former paragraph 175 (NPPF, 2023), now paragraph 182 (NPPF, 2024) has introduced additional wording regarding improvements to water quality and biodiversity, and seeks for all development which could affect drainage on or around a site, to incorporate proportionate sustainable drainage systems, relative to the nature and scale of the proposal. The draft Development Consent Order (DCO) for Botley West has been submitted with a Conceptual Drainage Strategy [**APP-167**] and the NPPF amends do not alter this strategy. Overall, in relation to Botley West, the updated NPPF is still a material consideration, and it provides overall and ongoing support for developments such as this. The NPPF Compliance Table will be updated for Deadline 6, with the Local Impact Reports and updated local policy status taken into account where necessary.
Q1.1.2	Applicant All Local Authorities	**The National Policy Statement for Airports**	The Applicant considers it has little or no relevance to the Botley West project and London Oxford Airport.

ExQ1	Question to	Question	Applicant's Response
	Oxford Aviation Services Limited Civil Aviation Authority	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.	The Airports NPS, 2018 was produced to provide the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and for applications for new runway capacity and other airport infrastructure in London and the South East of England. The Applicant is not aware of any advice in respect of how neighbouring development should be considered by the promoter of any such development. The advice is geared towards what airport operators should do and assess.
Q1.1.3	All local authorities	**Local Plans** Has the Applicant adequately included and summarised all relevant local planning policies? If not, why not?	
Q1.1.4	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?	The Applicant is aware of the, long held and substantial, ambitions to promote growth in the Oxford to Cambridge corridor, with a focus on technology, connectivity, economic and housing growth. The previous Government's ambitions for the corridor, including the delivery of up to 1 million homes, had somewhat stalled, but the pledge for growth was refreshed in a Statement to the Commons by Minister of State for Housing and Planning, Matthew Pennycock, on 29th January 2025; *"I am today updating the House on the government's plans to supercharge growth in the Oxford-Cambridge corridor and the high-potential sectors within it, as part of our ambitious Plan for Change.* *The Oxford-Cambridge region is already home to world leading universities and globally renowned science and technology firms. It has the potential to become one of the most innovative and economically dynamic areas in the world but numerous constraints, from inadequate transport connections to a lack of affordable housing, prevent it from realising its true potential. This government is determined to do what's necessary to drive sustainable economic growth in the region to the benefit of local communities and national prosperity.* *The Chancellor has today announced the appointment of Lord Patrick Vallance as a champion for the Oxford-Cambridge Growth Corridor. His extensive experience across life sciences, academia and government makes him ideally suited to identify and maximise growth opportunities in the region. He will work with me and other*

ExQ1	Question to	Question	Applicant's Response
			Ministers to ensure the corridor makes a significant contribution to kickstarting economic growth. *[cont'd]* *To ensure we can realise Oxford's full potential, we intend to take forward a new Growth Commission to explore how we can best unlock and accelerate nationally significant growth for the city and the surrounding area. The Commission builds on the government's commitment to making Culham in Oxfordshire the country's first AI Growth Zone as part of the government's AI Opportunities Action Plan. This is the government's modern Industrial Strategy in action.* *Across the Oxford-Cambridge Growth Corridor, we are demonstrating our commitment to investing in the delivery of major transport infrastructure and public services to boost the region's economic prosperity and contribute to national economic growth. The government are:* • *delivering the acceleration of phase 2 of East West Rail, connecting Oxford to Bedford from 2030. The full new railway to Cambridge will support vibrant new and expanded communities. We have already received 18 submissions for large-scale new developments within the corridor, each of which will be considered by the New Towns Taskforce;* • *moving quicker at Tempsford to deliver an East Coast Mainline station 3-5 years earlier than planned, which will link services directly to London in under an hour;* • *committed to upgrading ten miles of the A428, improving journeys between Milton Keynes and Cambridge; and* • *unlocking £7.9 billion investment in the next 5 years for water companies, by agreeing their water resource management plans. This will improve our water infrastructure and provide a foundation for growth and includes nine new reservoirs, such as the new Fens Reservoir serving Cambridge and the Abingdon Reservoir near Oxford.*

ExQ1	Question to	Question	Applicant's Response
			We will continue to update Parliament on the work of the government in the Oxford-Cambridge corridor." Botley West forms part of the commitment, in line with Government policy and local strategies, to providing new renewable energy sources to meet existing demand and future growth priorities, including those across the Oxford to Cambridge Growth Corridor, and those within Oxfordshire. The previous Oxford Growth Board / Future Oxfordshire Partnership, now (since March 2025) known as the 'Oxfordshire Leaders Joint Committee', has identified a Strategic Vision (although a Joint Strategic Spatial Plan for the County was dropped in 2022) – including the Oxfordshire Infrastructure Strategy (OxIS), engagement with the Distribution Network Operators (DNOs) and a Local Area Energy Plan, which is being developed. The Applicant considers that the Project will support the delivery of a significant component of the clean energy needed to support growth, with proposed implementation by 2028 and subsequently over a 42-year period. The plans for new housing delivery, including those necessary to meet Oxford's unmet housing needs and those needs of the host planning authorities, are already identified in adopted Local Plans, and the proposed Botley West scheme does not compromise these. Similarly, the upgrades to the East-West Rail link Phase 2 is not prejudiced by the proposals. The Botley West Project is not at odds with and does not prejudice other plans associated with the Growth Corridor. Rather it supports the energy needs associated with the proposed growth and with existing demand associated with the required shift to renewable energy. It is well established that the UK's electricity demand is forecast to significantly increase, and the Project plays a vital role in meeting this demand.
Planning Permissions			
Q1.1.5	All local authorities	**List of cumulative projects** The Applicant considered a long list of projects when assessing cumulative effects. Are there any	

ExQ1	Question to	Question	Applicant's Response
		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?	
Legislative Framework			
Q1.1.6	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?	Section 85 of the CROW Act states that In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. The relevant legal and policy tests are set out below: The Countryside and Rights of Way Act 2000 (CRoW) introduced provisions to help secure the better management and protection of NL/AONBs. Under section 89 it requires the preparation and publication of a management plan for every NL/AONB. It also places a duty on 'relevant authorities' when exercising or performing any function in relation to, or so as to affect, land in an NL/AONB, to have regard to the purpose of conserving and enhancing the natural beauty of the NL/AONB. NPS EN-1 at paragraphs 5.10.34 advises that the *"duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of the designation and such projects should be designed sensitively given the various, siting, operational, and other relevant constraint..."* and further advises that *"the fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent."* NPS EN-1 states at paragraph 5.10.36 confirms that *"the scale of energy projects means they will be visible across a wide area. The SoS should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project."* In summary the relevant legal tests are:

ExQ1	Question to	Question	Applicant's Response
			• has regard been had to the purpose of the NL in line with statutory duty? • would it be in accordance with NPS policy on NLs/AONBs to consent the Project and that any perceived adverse Landscape and visual impact of the Project be outweighed by its benefits? The LVIA **[APP-045]** has assessed the effects upon the Cotswolds National Landscape as a whole rather than assessing each individual special quality, as listed in the Cotswolds National Landscape Management Plan 2023-25 (Page 18). For clarity, the 14 special qualities of the Cotswolds National Landscape, and how the Project affects them, are as follows: • the unifying character of the limestone geology – its visible presence in the landscape and use as a building material (Not affected by the Project); • the Cotswold escarpment, including views from and to the National Landscape (Project not visible from the Cotswold Escarpment); • the high wolds – a large open, elevated predominately arable landscape with commons, 'big' skies and long-distance views (Project not visible from the High Wolds); • river valleys, the majority forming the headwaters of the Thames, with high-quality water (Not affected by the Project); • distinctive dry stone walls (Not affected by the Project); • flower-rich grasslands particularly limestone grasslands (Not affected by the Project); • ancient broadleaved woodland particularly along the crest of the escarpment. (Not affected by the Project) • variations in the colour of the stone from one part of the National Landscape to another which add a vital element of local distinctiveness (Not affected by the Project); • the tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution (the Project does not affect the tranquillity within the CNL. However, there is the potential for a negligible perceptual visual effect upon the visual tranquillity of the CNL); • extensive dark sky areas (the Project does not affect the dark skies within the CNL. Where there is possible intervisibility from the CNL, the Project has no permanent lighting and is set against the very noticeable lit backdrop of the City of Oxford); • distinctive settlements, developed in the Cotswold vernacular with high architectural quality and integrity (Not affected by the Project); • an accessible landscape for quiet recreation for both rural and urban users, with

ExQ1	Question to	Question	Applicant's Response
			numerous walking and riding routes, including the Cotswold Way National Trail (Not affected by the Project); • significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks (not affected by the Project); • a vibrant heritage of cultural associations, including the Arts and Crafts movement of the 19th and 20th centuries, famous composers and authors and traditional events such as the Cotswolds Olimpicks, cheese rolling and woolsack races (Not affected by the Project). The LVIA **[APP-045]** has assessed the indirect effects upon the Cotswolds National Landscape at construction, operation and decommissioning. Refer to sections 8.9, paragraphs 8.9.10 to 8.9.14 (construction); 8.9.113 to 8.9.117 (operation). Predicted effects upon the landscape and visual resource of the Project Site and surrounding area during the decommissioning would be equivalent to those experienced during construction for the duration of the decommissioning phase. Indirect effects upon the special qualities of the Cotswolds National Landscape are judged to be no greater than Minor adverse. As such, there would be no significant effects upon the Cotswolds National Landscape as a result of the Project. Any adverse effects, upon the special qualities of the Cotswolds National Landscape, that have been identified are likely to be reduced further as a result of changes to the Project, detailed within the changes request submitted at deadline 2. (EN 010147 Notification of Intention to Submit a Request to Change the Application, Change Request 2). The CNL would only be affected through visibility of the Project from a limited geographical area adjacent to Combe and not as a result of any physical change to the balance of its features or activities. It is the relationship and quality of the L&V receptors and activities within the NL that largely define its inherent character and integrity and these are not affected by the Project. In the Applicant's view, taking into account these factors, the effects predicted during construction, operation and maintenance and at decommissioning of the Project on the Cotswolds National Landscape are not considered to occur to such a degree that it would affect the integrity of the NL or its inherent natural beauty. As such, there is no impediment to the relevant authority's duties under s85 of the CROW Act.

ExQ1	Question to	Question	Applicant's Response
Design			
Q1.1.7	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.	The pile number and depth are not fixed at this stage due to ongoing detailed design work and micro-siting. However, a range of indicative parameters are presented in ES Chapter 6 [**APP-043**], Table 6.3, and section 6.4.2: • Indicative Foundation Type: Driven piles or screw piles • Indicative total number of piles: 780,000 to 1,600,000 • Depth of piles below ground level (m): 1.0 m to 3.0 m • The Pile type and density will vary according to soil conditions, topography, and panel layout. To ensure a precautionary approach, a worst-case scenario was adopted, based on a two-leg design option at each end, and which was assessed and reported in the ES. This scenario assumes an upper limit of 1,600,000 steel piles driven to a depth of 3 meters using pile-driving methods. Please refer to the **Appendix 7** Q1.1.7 Illustrative Mounting Structure Plan for the design scenarios.
Q1.1.8	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.	Please also note the Applicants answer to Q1.1.14 below. The following provides notes on Design Guides from the host planning authorities, and guidance on design matters at a national level. All of the three local planning authorities have adopted Design Guides, but these are primarily focused on residential design – and so are not relevant to solar farms; **Cherwell District Council** Adopted Residential Design Guide – adopted July 2018 – SPD – not relevant to solar farms **Vale of White Horse District Council** Adopted Design Guide (residential focussed) – adopted 2022 – SPD – not relevant to solar farms **West Oxfordshire District Council** Adopted Design Guide (residential focussed) - adopted April 2016 – SPD – not relevant to solar farms.

National Design Guidance

National Design Guide (2019)

This document is focused on buildings and place making, and whilst it contains cross references to the National Planning Practice Guidance (PPG), including the use of renewable energy in good design, the document does not provide guidance on solar farms.

The PPG on renewable and low carbon energy in particular does provide the following guidance;

"*Where a planning application is required, factors to bear in mind include:*

- *the importance of siting systems in situations where they can collect the most energy from the sun;*
- *need for sufficient area of solar modules to produce the required energy output from the system;*
- *the effect on a protected area such as an Area of Outstanding Natural Beauty or other designated areas;*
- *The colour and appearance of the modules, particularly if not a standard design.*

Paragraph: 012 Reference ID: 5-012-20140306"

The Applicant has had regard to the first, second and forth point above; point 3 does not apply as the Project does not affect any National Landscape (AONB).

NPS EN-3

Section 4.7 of NPS EN-3 notes that:

4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.

4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as

ExQ1	Question to	Question	Applicant's Response
			possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area. *4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.* *4.7.4 Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle.* *Applicant assessment* *4.7.5 To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles122 should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent.* *4.7.6 Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.* *4.7.7 Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.* The Applicant has described the evolution of the design and layout of the project in Chapter 5 of the ES [APP-042]. It has explained how the design process was conducted (paragraph 5.6.15 to 5.6.17 inclusive and 5.7.1 to 5.7.5 inclusive).

ExQ1	Question to	Question	Applicant's Response
			Design Principles were established from the outset (Para.5.6.15), and how these principles and protection measures can be secured post consent via the Outline Layout and Design Principles document [**PDB-012**].
Q1.1.9	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. 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? 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. 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.	1) Yes, the Applicant intends to install solar arrays on some north-facing slopes, particularly in the southern part of the site, subject to final design refinements and micro-siting decisions post-consent. 2/3) As stated in the ES Chapter 6 Project Description [**APP-043**], all solar arrays will comply with the maximum height limit of 2.3 metres at the upper edge and a typical lower edge height of 0.8 metres (see Table 6.3). On sloped terrain, mounting structures will be adapted to the ground profile to maintain this height constraint. This may involve reducing the tilt angle, using smaller modules, or deploying a single-row landscape configuration instead of stacked panels. Such design flexibility falls within the Rochdale Envelope and will be addressed during detailed design post-consent. Please refer to **Appendix 8** Q1.1.9 Mounting structure for the north facing slopes in the southern site areas. 4) The Applicant confirms that no earthworks will be undertaken to reshape or regrade the land to accommodate solar panels on these slopes. The adaptive approach described above, and the detailed design to avoid earthworks, will be developed further through the advancement of the outline Code of Construction Practice [**APP-232** & **APP-233**] into its detailed form.
Q1.1.10	Applicant	**Outline Layout and Design Principles document (OLDP)** The OLDP [APP-238] omits several details that the ExA request elaboration upon. These are: 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	1) The detailed design, layout, materials and colours to be used on the substation will be a matter for National Grid. Currently, therefore, the Applicant intends to agree such details with the relevant planning authority via the discharge of Requirement 5 of the Draft DCO, Schedule 2 [**REP1–004**]. The Applicant will, however, continue to liaise with National Grid to establish whether there is further detail that can be incorporated into the Applicants OLDP document.

ExQ1	Question to	Question	Applicant's Response
		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. 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. 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. 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.	2) The Applicant intends to agree such details with the relevant planning authority via the discharge of Requirement 5 of the Draft DCO, Schedule 2 [**REP1 –004**]. 3) The Applicant intends to agree such details with the relevant planning authority via the discharge of Requirement 5 of the Draft DCO, Schedule 2 [**REP1 –004**]. 4) The design parameters used by the Applicant team for the height of the National Grid substation have changed since its assessment was undertaken. The Applicant has subsequently undertaken a comparison ZTVs of the different heights of the NG substation to provide clarity of the specific change in substation height. The Applicant can confirm that whilst there is a slight increase in areas of land that have potential views of parts of the substation, the additional visibility resulting from the increased height, the assessment of landscape and visual effects remains as stated in the LVIA [**PDB-006**]. In summary, whilst a maximum height of 12m (main building) was assumed for the purposes of the environmental assessment submitted with the application, the Applicant has re-considered its existing assessment in light of the 14m height and confirms that the levels of significance as currently reported within the ES do not change. A full explanation in response to this is set out in the response to PINS Action Point 2 in the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [**REP1-019**].
Q1.1.11	Applicant	**Minimising glint and glare through design** What design features would the solar panels have to ensure potential impacts due to glint and glare are at an absolute minimum?	Solar panels have been setback from sensitive glint and glare receptors where possible and vegetation has been proposed to limit views where significant impacts were predicted within the Glint and Glare Assessment.
Q1.1.12	All local authorities	**Independent Design Review** 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?	
Q1.1.13	Applicant	**Air or Gas Insulated**	1) The Planning Supporting Statement [**REP1-012**] referred to the National Grid substation as an example in relation to SF6 because the high-voltage gas-

ExQ1	Question to	Question	Applicant's Response
		The planning statement [APP-225, paragraph 3.3.67] makes a commitment to secure switchgear that is not insulated with Sulphur Hexafluoride, SF6. 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?	insulated switchgear (GIS) within the National Grid (NGET) substation is historically the most likely component to involve SF_6. However, he delivery of the NGET substation will be subject to Ofgem's regulatory position, which discourages or restricts the use of SF_6 in new GIS installations — effectively ensuring SF_6-free delivery in practice. 2) The Applicant does not consider it appropriate or necessary to secure the commitment to SF6-free assets in relation to the new National Grid substation because the delivery of that infrastructure will be subject to the Ofgem controls referred to above, which are relevant and applicable in relation to SF6 free development. To confirm, it is the Applicant's intention to avoid the use of SF6 reliant assets across the Project. However, the Applicant is not able to make a firm commitment to that at this point of design. The Applicant is preparing a detailed technical note to support this need for this design flexibility in light of the national policy position. The Applicant will submit this technical note on or before Deadline 3. 3) If the NGET substation is delivered outside the Order limits, it will still be subject to Ofgem's regulatory position, which discourages or restricts the use of SF_6 in new GIS installations—effectively ensuring SF_6-free delivery in practice. This existing assessment already considers the reasonable worst case in respect of the use of SF6 assets. Notwithstanding the intention to avoid the use of SF6-reliant assets, the Climate Change assessment [**APP-051**] confirms: "*Manufacturers of equipment that does continue to use SF6 are sealed-for-life with extremely low leakage rates (Widger & Haddad, 2018). For this reason, it is assumed that emissions of SF6 from the Project will be negligible and not material to the GHG assessment, as such, they have not been considered further*" (paragraph 14.5.23).
Q1.1.14	Applicant	**Design Principles** 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	The Applicant recognises and supports good design. The Applicant's approach to securing good design is achieved in a number of different but complimentary ways. The submitted plans incorporate embedded mitigation measures that the Applicant has imposed from the outset of the project but then refined up until the point of submission. The Applicant has also developed its OLDP document [PDP-012] has achieved this through embedded

ExQ1	Question to	Question	Applicant's Response
		Commission. The NPPF also advocates good design. 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: • Solar panels and associated equipment. • On-site substations and associated equipment and structures. • Boundary Treatments. • Hard and soft landscaping	mitigation measures and with the use of its OLDP, and, in due course, by discharging requirements (design for detailed approval post any consent for the solar farm). Other than general references to good design within the NPS EN-1 and in the NPPF, there is no detailed design guidance at national or local level, for the applicant to use as a guide to inform the design and layout of the project. In the absence of such guidance, the Applicant team has used its combined planning and environmental knowledge, and that of its knowledge of the local area (RPS is a locally based firm of planning and environmental consultants), to guide the current design and layout approach but also to ensure there are mechanisms in place to ultimately deliver an acceptable development from a design and layout perspective. In the context of good design, it is important to note that the Applicant does not seek detailed design approval at this stage for any of the infrastructure the subject of its draft DCO submission. All plans submitted are deliberately labelled illustrative or indicative. There are two main reasons for postponing detailed design and layout approval. The first is that if the DCO is granted, the nature of the procurement process that will follow will itself yield potentially different design solutions to that which is currently before the ExA; the applicant cannot accurately predict what this is at this stage so has simply set design parameters within which specific design solutions will emerge. The second reason is detailed design approval for all infrastructure will be subject to approval from the relevant host authority via the discharge of requirements (DCO Schedule 2, Requirement 5 [**APP-015**]. Those details also need to accord with the Design Principles Document [**REP1-014**], which itself cross reference Management Plans within which there are design and technical measures designed to ensure the development is carried out in way that avoids or minimises adverse environmental effects). To this extent, the ExA and SofS can take comfort from the fact that such detail should still be the subject of additional scrutiny and approval post any consent. For assessment purposes, however, the Applicant has in some instances referred to material type and colour (e.g. solar panel colour (three colours mentioned), and material for the frame and mounting structure – anodized aluminium and galvanized steel respectively– see Table 6.3, Chapter 6 [APP-043]. However,

ExQ1	Question to	Question	Applicant's Response
			even here the Applicant is willing to consider alternatives, providing that any alternatives considered do not lead to materially different or new environmental effects to those already reported. The applicant has also submitted detailed vehicular access layout plans of the access points to the four planned construction compounds. It was considered that such detail was necessary at this stage to allow the ExA and relevant highway authority to have confidence such access points were technically acceptable in highway terms. If acceptable, this might facilitate a quicker resolution post consent which then would allow the Applicant to start work with minimal delay. The Applicant also wanted to be sure about any hedgerow loss that may be caused in creating such an access point, so these related effects could be identified and assessed. In terms of the *layout* the infrastructure, this has been set out in Chapter 5 of the ES [**APP-042**], particularly sections 5.6 and 5.7.i. Notwithstanding, this has been informed by matters including: - an understanding and appreciation of the landscape character of the area, and the desire to compliment that in the way the infrastructure is sited (largely avoiding the felling of any trees and removal of hedgerows), allowing opportunities to introduce new hedgerow and woodland planting [see **APP-045**]; - The desire to avoid uninterrupted views of the solar farm from any public vantage point, by the introduction of either new planting of hedgerows and woodland, and the effective management of that resource; - The desire to maintain and introduce new footpaths/cycleways through the development; - A recognition of the need to accommodate appropriate buffers away from sensitive receptors (e.g. residential properties, schools, footpaths, woodland, hedgerows, bat foraging corridors, rivers and other watercourses; - A need to avoid flood zones 2 and 3; - The desire to minimise permanent BMV loss; - The desire to maintain openness within the Green Belt; - The need to avoid any unacceptable direct or indirect effect upon the Blenheim Palace World Heritage site; So, in accordance with NPS EN-1 section 4.7 and paragraph 4.7.5, design principles were established from the outset of the project to guide the development from conception to operation. The Applicant has also considered

ExQ1	Question to	Question	Applicant's Response
			how their design principles can be applied post-consent in terms of DCO Schedule 2, Requirement 5 [**APP-015**]. Those details also need to accord with the Design Principles Document [**REP1-014**].
Q1.1.15	Applicant	**Cable burial** 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?	While the 1.5 m depth is not yet formally secured via a specific Requirement in the Draft Development Consent Order (DCO), burial methodology is governed through: • Requirement 5 of Schedule 2 of the DCO mandates submission and approval of detailed design, including cable routing and installation techniques. • Reference to the Cable Laying Methodology in ES Appendix 6.2 [**APP-130**], which outlines trenching and HDD techniques. If site conditions or constraints prevent burial to 1.5 m, the Applicant will implement mitigation such as: • Adjusting the cable burial location within the cable corridor • Protective ducting or concrete slab covers where shallower burial is required, as depth may be reduced slightly if **concrete tiles**, **slabs**, or **ducts** are used to provide added mechanical protection, but this is subject to risk assessment. • For known obstacles, trenchless techniques such as HDD installation under sensitive features (e.g., rivers, roads, archaeology). These approaches would be reviewed and approved by the relevant planning authority during the detailed design stage and would remain within the parameters assessed in the Environmental Statement.
Miscellaneous			
Q1.1.16	Applicant	**Decommissioning - general** Requirement 14 (1) states that decommissioning will commence no later than 37.5 years following the date of final commissioning. 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?	1) The date of final commissioning is defined in the Draft DCO [REP1-004] as "*the date on which the authorised development commences operation by generating electricity on a commercial basis but excluding the generation of electricity during commissioning and testing*". As set out in Chapter 6 of the ES [APP-043] the Construction Phase for the Project is anticipated to start in July 2026 and end in June 2028, with the date of grid connection assumed to be in October 2028. While the final commissioning date is not specified, there is little space in the programme for slippage on the basis of the grid connection date. Under Requirement 2, the DCO also must not begin after 5 years of the order coming into force, although for the reasons outlined above a delayed commencement of the construction phase would have implications for the grid connection date. For that reason, no it is not

ExQ1	Question to	Question	Applicant's Response
		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.	possible for the lifetime for parts of the project to be substantially longer than 37.5 years, although it is possible they could be some months longer. 2) The maximum lifetime for the Project is 42 years, taking into account the construction, operation, and decommissioning periods outlined in Chapter 6 of the ES. 3) The Draft DCO does not impose a minimum time period within which decommissioning must take place. However, the Outline Decommissioning Plan provides that decommissioning is expected to take 24 months to complete. That plan is secured through Requirement 14, with the decommissioning plan required to be in substantial accordance with the Outline Decommissioning Plan, and to be approved by the relevant planning authority. It would be difficult for a decommissioning period significantly longer than that to be provided for in the decommissioning plan to discharge Requirement 14, on the basis that effects have been assessed based on this period. However, there must be some degree of flexibility on the basis that the duration of the decommissioning period could be affected by matters outside of the Applicant's control, such as inclement weather, supply chain and contractor availability. 4) The Applicant's response to this issue is outlined in the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 1 [REP1-019]. In short, bonds are not considered to be required for Solar DCOs on the basis that the infrastructure has asset value, which provides a financial incentive to decommission. It is also a criminal offence under the Planning Act 2008 to fail to comply with the decommissioning requirements of the DCO. 5) The following Requirement was included within the draft DCO for Oaklands Solar Farm by the Examining Authority in its Recommendation Report: *Decommissioning fund 27.—* *(1) No phase of the authorised development may commence until a decommissioning fund or other form of financial guarantee that secures the cost of performance of all decommissioning obligations under Requirement 22 of this Order has been submitted to and approved by the local planning authority.*

ExQ1	Question to	Question	Applicant's Response
			(2) The value of the decommissioning shall be agreed between the undertaker and the local planning authority or, failing agreement, determined (on application by either party) by a suitably qualified independent professional as being sufficient to meet the costs of all decommissioning obligations referred to in Requirement 22 of this Order. *(3) The decommissioning fund shall be maintained in favour of the local planning authority until the date of completion of the works to be undertaken in accordance with Requirement 22 of this Order.* *(4) The value of the decommissioning fund shall be reviewed by agreement between the Undertaker and the local planning authority by a suitably qualified independent professional no less than every five years and increased or decreased to take account of any variation in costs of compliance with decommissioning obligations and best practice prevailing at the time of each review.* The Secretary of State rejected this in their decision, saying, among other things, that: "*the Secretary of State notes there is no policy requirement for a decommissioning fund to be imposed as paragraphs 2.10.146 to 2.10.151 of NPS EN-3 set out the considerations for the Secretary of State in relation to project lifetime and decommissioning of solar developments*".
Q1.1.17	Applicant	**Decommissioning – piles and soil stability** 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. What assessments have been made into the safety of doing this, particularly in relation to the leaching of heavy metals or other contaminates into the soil, which is then proposed for a return to agricultural use?	All solar PV infrastructure, including modules, mounting structures (including piles), cabling, inverters, and transformers, will be fully removed at decommissioning, except for cables laid in the public highway or via HDD and the NGET substation, as confirmed in Chapter 6. To the extent required to remain for future operations by the Grid Operator.

ExQ1	Question to	Question	Applicant's Response
Q1.1.18	Applicant	**Replacement of Panels** 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. At this time: 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? 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? 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? 5) Alternatively, would there be a reduction in number of panels in order to limit the output?	1) The mounting structures (frames) for the Botley West Solar Farm are designed for a service life of minimum 40 years, consistent with the project's 37.5-year operational lifespan [**APP 234**]. 2) Future PV modules may vary in size or electrical specifications due to technological advancements. To accommodate such changes, it is standard industry practice to use retrofit-compatible modules, panels specifically selected or designed to align with existing mounting structures. Where exact matches are unavailable, adapter brackets or custom clamps are employed to secure newer modules to the original racking. This approach enables continued use of existing foundations and support posts, to avoid the need for structural modifications and reducing operational disruption during panel replacement. 3) As outlined in the OOMP, panel replacement is part of planned maintenance, and any piling would be subject to structural assessment and fall within the existing DCO provisions unless materially significant. 4) The project is currently limited to an export capacity of 840MW under the NGET connection agreement (Section 1.3.1, [**APP-234**]). This cap applies regardless of future improvements in panel efficiency. Any additional generation would primarily offset natural performance degradation over time, helping maintain the planned generation level within the existing cap.
Q1.1.19	Applicant	**Solar Panel Mounting Mechanism** In ES Chapter 6 [**APP-043**] paragraph 6.4.10 describes the solar module mounting structure as being a metal framework, supported by galvanised stell piles or screws, with a worst-case assumption of two legs at each end. 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.	Each mounting table will support 26 panels in a 13×2 landscape configuration and be supported by piles, with all structures designed to remain within the assessed parameters set out in Chapter 6 of the Environmental Statement [APP-043]. Panel dimensions, table spacing, pile depth, and total number of piles fall within the ranges assessed in Table 6.3, and mounting heights will comply with the fixed limits of 0.8 m (lower edge) to 2.3 m (upper edge), including on sloped ground. Please refer to the Appendix Q1.1.7 Illustrative Mounting Structure Plan.

ExQ1	Question to	Question	Applicant's Response
Q1.1.20	Applicant	**Statement of Commonality – Agricultural land use** 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. Please explain the variation between the two documents.	The comment in the Statement of Commonality, that the matter of agricultural land use is not relevant, was an error in that document. The matter is under discussion, and yet to be agreed. It will be progressed and further updated in the next iteration of the Statements of Common Ground. The Statement of Commonality has been amended to reflect this.
Q1.1.21	Applicant and local authorities	**Statement of Common Ground – content** Please provide a justification as to why matters relating to socio-economics and health are not included within the draft SoCG submitted at DL1?	In preparing the application, the Applicant has been in discussions with the OCC Public Health Team, and with OxLEP in the preparation of the submitted Employment and Skills Plan. The expectation is that Human Health and some socio-economic matters will be able to be drawn into the emerging SoCGs with the host authorities, and can be reflected in the draft SoCG submitted at a later deadline, potentially Deadline 3.

2.2 Q1.2 Air Quality and Emissions

ExQ1	Question to	Question	Applicant's Response
Air Quality Management			
Q1.2.1	Applicant	**Institute of Air Quality Management (IAQM) assurance measures implemented by other developers** In para 19.10.3 [APP-056] it states, 'on the basis that other proposed developments implement suitable primary and tertiary mitigation, as recommended in the Guidance on the assessment	The Applicant has undertaken a Dust Risk Assessment and prepared an Outline Dust Management Plan [**APP-233**] (oDMP) outlining mitigation proportional to the level of risk for the development. The measures outlined in the oDMP, when implemented would reduce the development's dust impact to a level that is not significant. It is the responsibility of the other developers to ensure they also appropriately mitigate their dust emissions. It is likely that planning conditions will

ExQ1	Question to	Question	Applicant's Response
		of dust from demolition and construction (IAQM, 2024), it is considered that cumulative effects arising during construction are not significant'. 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?	be imposed by the relevant local authorities that will require developers to monitor the effectiveness of their mitigation measures.
Q1.2.2	Applicant	**Screening out of operational activities** 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?	In preparing the application, the Applicant undertook a detailed modelling assessment of the construction traffic and demonstrated that the impacts would not be significant. The operational traffic would be significantly less than during the construction phase and the air quality impacts would remain not significant. Furthermore, it is highly unlikely that a significant number of solar panels would require replacement at the same time. The updated outline Operational Management Plan [**EN010147/APP/7.6.2**], submitted as part of this Deadline 2, provides more information on the approach to replacement, and maintenance, activities. The operational traffic will likely be below the EPUK/IAQM thresholds to require an assessment.
Impacts on human health			
Q1.2.3	Applicant	**Cumulative impacts due to construction overlap** 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?	Table 12.33 of ES Chapter 12 is correct. The Land North of Banbury Road, Woodstock, the subject of Cherwell DC planning application 21/00217/OUT, has been included in the cumulative assessment, and ES Chapter 12 Traffic and Transport [**APP-049**] has, as with other potential cumulative projects, made assumptions about likely build-out to ensure a reasonably worst-case transport model. ES Appendix 20.1 Cumulative Developments Longlist and Shortlist [**APP-224**] (pdf page 3 of 20) also confirms that the 'Land North of Banbury Road, Woodstock 21/00217/OUT' development has been considered in other chapters of the ES. ES Chapter 19 Air Quality [**APP-056**], at Table 19.43, is consistent with other ES chapter cumulative assessment tables in not *specifying* a date of construction. Paragraphs 19.10.2 to 19.10.4 of Chapter 19 consider the cumulative construction related points, in relation to the transport and the traffic data that has been modelled.
Q1.2.4	Applicant	**Fire or damage**	The solar panels proposed for Botley West are durable, solid-state units with no liquids or hazardous substances that could leak during normal use or extreme

ExQ1	Question to	Question	Applicant's Response
		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?	weather. The materials used (silicon, EVA film, glass, backing film, aluminium frame) are stable and sealed. The cells are embedded in polymer films (e.g. EVA) and protected by front glass and back glass - this prevents material leakage. The potential for pollutant release from fires is acknowledged as a consideration in the assessment of health and environmental impacts. While such events are considered unlikely, measures are expected to be in place to manage associated risks and avoid or minimise potential effects on air quality, soil, and groundwater. The solar panels chosen have a very low proportion of materials that could be flammable and are therefore, unlikely to be a fuel source that would allow an electrical or other fire to be sustained and spread. Small, localised, fire is very unlikely and even then the emissions would also be unlikely to pose a risk to the public at that scale. The appropriate management and clearing of vegetation, including from hedge and scrub maintenance, would remove the main fuel source associate with any fire risk.

2.3 Q1.3 Assessment of Alternatives

ExQ1	Question to	Question	Applicant's Response
Strategic Alternatives			
Q1.3.1	Applicant	**Substation search** 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. 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	Cowley was initially chosen because it was that substation that had the capacity to provide a connection of the size sought by the Applicant, and NGET were receptive to the Applicant making such a connection. This decision was taken in late 2019. The choice to develop a new 400kV substation was that of National Grid (NGET), not the Applicant. The Applicant understands that NGET is able to develop new substations if there is the demand for multiple new connections; PVDP and other developers had already expressed a desire for a new connection(s), and in the case of PVDP this started at Cowley, given the capacity available at that substation at the time.

ExQ1	Question to	Question	Applicant's Response
		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 overheard lines, not proximity to Cowley, why was a substation not considered on land outside the Green Belt?	However, to connect at Cowley the Applicant also had to find land for its own substation (either within the curtilage of the substation or close by), as well as land to build the solar farm. Land within the substation curtilage was not available, and land in the immediate vicinity to the substation was owned by others, including Thames Water. PVDP began to make enquiries of these landowners, but at about that time (late 2019) the Applicant became aware that NGET were contemplating building a new substation which would not only provide a connection for the Applicant but for other developers too. That then triggered a site search for a new substation by NGET, not the Applicant. The Applicants attention then focused on connecting to this new substation. The Applicant is aware that NGET went through a site selection exercise in the vicinity of the corridor of 400kV OHL west of Cowley. NGET applied their own criteria to that site search, and so the Applicant is unaware of how Green Belt factored into their site search criteria. The Applicant applied for a connection on 10th February 2021. A Point of Connection Offer (PoC) was granted in June 2021 with a connection date in October 2026. There was therefore pressure upon the Applicant to deliver the consent for the solar farm, and pressure upon NGET to deliver a substation to honour the PoC offer. The Applicant maintained contact with NGET from this time to follow their site search efforts and to understand the likely timing of the delivery of their substation. This was important as the Applicant also had to allow time to secure consent for its solar farm through the NSIP regime, so that the solar farm and consent for the substation coincided and could be delivered in a timely manner. The Applicant did not want to apply for its DCO application without there being a clear prospect of delivery of the NGET substation because a stranded asset is not attractive from a viability and investment perspective, and mindful of the need to demonstrate to the Secretary of State that there are no obvious impediments to the implementation of the NSIP. Due to congestion in the grid connection queue, this is a common issue faced by energy generators, and one being addressed by NESO's ongoing grid connection reform that will help future projects. As time went on it became increasingly clear to the Applicant that there may be mis-match between the timing and risk of delivery of the NGET substation and the timing and delivery of the solar farm i.e. there seemed to be a possibility that any consent for the solar farm may be granted before consent for the NGET substation. The shortlisting and evaluation process undertaken by NGET was taking longer than anticipated and that, plus the possibility that once NGET were ready to submit for planning, permission may still be refused in which case they

ExQ1	Question to	Question	Applicant's Response
			would be delayed either by a preparing a revised planning application and/or by needing to appeal the refusal, both of which would take a significant amount of time. This was considered to be a consenting/delivery risk to the Applicant and so the Applicant chose to manage this risk by incorporating an alternative NGET substation site within the Order limits of its own DCO application. This was done with the full knowledge of NGET. The site selected by PVDP for the NGET substation was within the NGET area of search which by that stage had narrowed to an area with approximately six alternative sites along a short stretch of the 400kV OHL corridor, and on land that was within the Applicants Order Limits. To the knowledge of the Applicant none of the shortlisted site areas lay outside of the Oxfordshire Green Belt. The Applicant did not look beyond this corridor as to do so would fetter NGET's own site search criteria. The Applicant then sought appropriate design parameters from NGET that they could use within their DCO submission to enable an NGET substation to be built and for a suitable connection to the adjacent 400kV OHL to be made. The acknowledgement and acceptance of this approach is reflected in the SoCG that is being discussed between the Applicant and NGET. The SoCG is currently with NGET for comment and will be submitted in due course. NGET have currently asked the Applicant to withhold submission for now, until they have provided comments. As explained by Mr Lecointe of behalf of the Applicant at ISH-1 [REP1-019, page 15], the project site and its component parts were chosen using a combination of factors, as anticipated from paragraph 2.10.18 of NPS EN-3. Substation location was one of a number of factors, but no single factor was determinative of the site and layout chosen. The narrative above explains in more detail how the NGET substation site was selected. Whilst not at the site of the Cowley substation, it was still within an acceptable distance to allow land negotiations with nearby willing landowners to continue to be progressed and allow the solar farm design and layout to evolve into a viable project. Notwithstanding the above, it is the Applicants position that there is no policy *requirement* which requires it to search for a site for a substation or for any other form of development, outside of any Green Belt first. Policy does not require a sequential approach to be followed in that respect. Policy in this respect is expressed as a preference, not a requirement. This is explained further below. NPS EN-3 para. 2.10.29 and 2.10.31 does it make a reference to this matter.

ExQ1	Question to	Question	Applicant's Response
			Para.2.10.29 states: "While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land...". At para 2.10.31 of NPS EN-3, it notes the 'preference' for development to be on suitable brownfield...land". In NPS policy terms therefore, the Applicant characterises policy as a preference in policy terms not a requirement, and even then only where possible and where suitable. To reinforce the point, in NPS EN-3, para 2.3.9, it states that as most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1,the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land). Beyond the NPS policy above, the NPPF (para 148) talks about a sequential test but only when considering a *change* in Green Belt *boundaries* or the *release* of Green Belt. The applicant is not seeking a change to nor a release from the Green Belt, and in the Applicants view therefore, para 148 does not apply. Notwithstanding the policy position on this matter, the Applicant, in its search for suitable sites, looked at previously developed and brownfield land for the Project as potential suitable sites. For example, the Applicant looked at land near to, and grid connection at, the former Didcot A power station, but that was controlled by RWE and neither the connection nor the land was available to the Applicant. Shortly after the Applicant's enquiry, both the land (part of) and connection was subsequently used by a recently consented, and now constructed, data centre. The Applicant has also carefully assessed potential impacts on the Green Belt as part of the ES, and sought to avoid, minimise and mitigated those effects in accordance with the mitigation hierarchy.
Q1.3.2	Applicant	**Substation search and underlying choices** 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	Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. Table 5.1 and the accompanying narrative explain in detail how alternatives were considered and how the site came to be selected. Paras 5.6.1 to 5.6.17 highlight the interplay between factors that the applicant considered.

ExQ1	Question to	Question	Applicant's Response
		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. 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. Could you provide a chronology, and reassurances, to the ExA to demonstrate that the assessment of alternatives was undertaken holistically?	The NPS policy on 'Alternatives', is set out in NPS EN-1, para 4.3.15 – it follows the EIA regulations i.e. information about the reasonable alternatives the developer has studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. The applicant followed this policy advice. Again, the Applicant points out that there was no single or determinative factor that influenced the final site chosen or its size; it was a combination of many factors, considered over time and overlapping one another. They did not happen in a clear isolated sequence. Irradiance was one factor and Mr Trebelsi has explained during ISH1 how the Applicant considered that [REP1 018, pages 15,15 and 18 19]. NPS EN-3 para 2.10.18 is not a prescriptive list of influences that the applicant should consider, or consider in a particular sequence; it is a list of factors that are considered may influence site selection. The Applicant has confirmed and explained how they all played a part. Connection capacity at a substation had to be suitable and available or could be made available, but at the same time so was the availability and suitability of land nearby to accommodate a solar farm at scale. Without a substation, one doesn't have a project; without land, one does not have a project. Planning and environmental constraints also played a key role in site selection and the scale of the development. Notwithstanding, the chronology of events happened as follows: - Decision to find a suitable site in the UK: Summer 2019 - Period within which work was undertaken to find a substation with suitable capacity: From Summer 2019 with review of potential substation sites in October 2019 1) Period within which work was undertaken to find willing landowners: From November 2019 with negotiations commencing February 2020; 2) Period within which work was undertaken to evaluate suitability of land from a planning and environmental perspective: From May 2020 with constraints mapping and desk studies; 3) Period within which work began to consider design and layout of the solar farm and related electrical equipment: From January 2021;

ExQ1	Question to	Question	Applicant's Response
			4) Period of time when environmental surveys began: From March 2021; 5) Point of Connection Offer: June to August 2021 This chronology shows how the site selection and refinement process happened over time, with lengthy areas of overlap between these work streams. To manage and this flow of information and to aid decision making, the Applicant and it legal, planning and environmental team held weekly meetings. In reality, projects of this nature are extremely complicated to deliver. Many factors have to be considered alongside one another, constantly reviewed, and decision making has to be agile, otherwise they take many years to deliver or are not delivered at all. The Applicant believes national planning policy acknowledges these challenges and risks that the private sector face and have developed policy with sufficient flexibility to allow them to come forward. In this case proper regard has been taken to all policy requirements and they have constantly reviewed consenting risk and environmental harm and constantly sought to apply the mitigation hierarchy to avoid adverse impacts or to minimise them.
Q1.3.3	Applicant	**Grampian-style requirement** 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. 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. The ExA remain concerned and therefore request that the Applicant provide, on a	The Applicant maintains that such a requirement is not appropriate or necessary for this Project. Firstly, paragraph 4.11.6 of NPS EN-1 expressly envisages that Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. This situation would be more uncertain than the Project position because a grid connection agreement has been entered and, whilst the point of a connection is into a new substation, the DCO includes necessary powers to deliver that substation in absence of a separate planning permission. In any event, the commercial reality is such that it is not realistic or even at all likely that there would be a situation in which the Applicant built out the entire solar farm without any grid connection. Paragraph 4.11.8 of NPS EN-1 continues to anticipate that "*it may not be possible to coordinate applications*". Paragraphs 4.11.8 and 4.11.9 go on to set out what the Applicant needs to satisfy the decision maker of in that situation. Including:

ExQ1	Question to	Question	Applicant's Response
		without prejudice basis, wording of such a requirement.	• Paragraph 4.11.8 allows Applicants to decide to submit separate applications for each element of a project but states that the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused. The Applicant has a grid connection agreement with National Grid [**APP-019**], and that as the system operator, National Grid was under certain obligations to deliver on the grid connection under the agreement in place. There is also no obvious reason why the planning application for the new National Grid substation should be refused. National Grid has indicated it is pursuing an application for planning permission, and the Applicant anticipates planning permission being granted, having regard to relevant planning policy. • Pursuant to the tests in paragraph 4.11.9, the Applicant has also captured the new National Grid substation as part of its cumulative assessment (see Chapter 20 - Cumulative Effects and Inter-relationships [**APP-057**]). The Applicant disagrees that the absence of a granted planning permission creates doubt as to the ability for National Grid to construct the new substation. As explained at Issue Specific Hearing 1, the Applicant has included fallback consenting powers within the dDCO (see Work No. 2) which can ensure that the delivery of the Project is not impeded should National Grid be unable to deliver its substation. This approach aligns with precedent set by other solar projects, for example the Cottam and West Burton Solar Projects, where the DCOs include powers regarding works to National Grid substations that can be delivered by the Applicant in the event that National Grid were unable. The inclusion of a Grampian-style requirement would unnecessarily delay the delivery of the Project given the DCO provides the necessary certainty that the new National Grid substation can be delivered under that same consent. Finally, NPS EN-1 emphasises the urgency with which schemes such as the Project need to be delivered, for example at paragraph 4.2.2 "*Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale."*

ExQ1	Question to	Question	Applicant's Response
			For reference, a similar requirement was sought on the Drax Bioenergy with Carbon Capture and Storage Extension Order 2024, however the Secretary of State found no reason to impose such a requirement. In summary, the ExA suggested the Secretary of State should consider whether to include a requirement in the Order to restrict commencement of the development until an environmental permit and consents for the transport and storage of carbon dioxide ("CO2") were in place similar to Requirement 33 of the Keadby 3 Order 2022 [ER 7.3.22 et seq.]. The ExA agreed with the Applicant that the two projects are distinguishable by virtue of the fact that the Proposed Development does not seek consent to generate electricity in a way that also emits carbon as was the case in the Keady 3 Order [ER 7.3.25]. This distinguishing feature also applies to the Project – without the requirement or restriction for Keadby3, the powers would have allowed the Applicant to build a new gas fired power station and operate it without carbon capture; whereas the Project does not rely on the planning permission for the new National Grid substation in order to control its potential effects (or benefits, noting the flexibility in the DCO to deliver the new substation under the DCO). In absence of the Grampian condition there is still a check in place via paragraph 2(4), Schedule 16 of the Draft DCO which ensures that when the Applicant is discharging requirements, it will need to confirm that the subject matter being approved would not be likely to give rise to any materially new or different environmental effects compared to those in the ES. The Applicant is therefore bound by the effects contained in the ES. To reiterate, in terms of weight to be given to the contribution of the Project to the urgent need for renewable energy generation, that NPS EN-1 paragraphs 3.2.6-8 are clear that the need should be given substantial weight. Essentially, EN-1 envisages different elements coming forward at different times and the Applicant has provided sufficient certainty that we see no reason why the substation will not come forward (either under the separate planning permission or utilising the DCO powers); there is no policy support for such a requirement (or precedent in a similar scheme); the commercial reality is that the Applicant would not build out a substation without some degree of certainty; and National Grid is under obligations to deliver substation under the grid connection agreement.

ExQ1	Question to	Question	Applicant's Response
Q1.3.4	Applicant	**Reductions** 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?	The Applicant suggests that the ExA may mean the Applicants response to Cassington, not Bladon, Parish Council in Table 5.2. Notwithstanding, it is understood that the Parish wished the Applicant to consider a reduced scale of the solar farm as an 'alternative', not as a way to manage any specific harm. For the avoidance of doubt, size of site was an alternative considered by the Applicant, as that is explained at **[APP-042]**. In respect of measures to mitigate potential effects, the Applicant has addressed identified harm, by applying the mitigation hierarchy. As experienced planning and environmental consultants, the Applicant team, prior to any consultation, used its combined professional experience, and its knowledge of the area, to self-impose restrictions, or 'concessions', to the development of the site. As soon as the Applicant had gained enough certainty of what land it could secure (during 2021), it began a continuous cycle of testing and refinement applying the mitigation hierarchy, 'conceding' land or layout designs, where harm could not be satisfactorily mitigated. The draft project proposals presented at the subsequent consultation stages, therefore, had already been the subject of considerable refinement, but the feedback from the consultation exercises fed into that testing and refinement process too. In the case of the Airport, the Applicant was not aware of any safeguarding zone affecting land around the airport. That is because no such safeguarding zone was or has been declared by the Airport, nor therefore was or is there any local planning policy which could have reflected the need for safeguarding within such a zone in policy terms. Despite not having declared any safeguarding zone around any part of the airfield, the Applicant first became aware of the Airports concerns from the informal consultation exercise the Applicant undertook in late 2022. The Applicant then held a meeting with the airport in January 2023, and engagement has been ongoing, intermittently, since that point. The ExA is aware of the emerging SoCG with the Airport, and the Applicant has now voluntarily chosen to remove significant areas of panels to try to accommodate the Airports concerns. This will be the subject of a further Change Request In relation to the setting of The Blenheim Palace WHS, the applicant was aware from the very early stages of the Project (during 2021), again prior to any consultation activity, that this represented an important issue that needed careful

ExQ1	Question to	Question	Applicant's Response
			evaluation and a considered response. The Applicant was sensitive to the need to avoid any direct impacts upon the WHS and to avoid harm to its setting. The Applicants' early expert assessment involved setting the installation sufficiently far away so as to avoid any significant adverse environmental effect. However, they engaged with Historic England and the Palace themselves to discuss and to agree what an appropriate solution might be. As part of that engagement a visit was made to the upper floors of The Palace, to gain an appreciation of the views out from The Palace, south towards Bladon and the land beyond, to enable the Applicant to understand intervisibility and appreciate setting issues in this direction. This engagement has been ongoing and has resulted in a recommendation by HE to move the installation even further away from the WHS to protect the setting. The Applicant is currently considering removing panels to overcome their concerns and this too is likely to form the basis of a second Change Request With its self-imposed restrictions upon the development of the Project site, plus ongoing engagement with IP's, the Applicant had paid appropriate attention to avoiding or mitigating identified harm. The Applicant has continually applied flexibility in its approach to the layout and design of the Project, respecting relevant planning and environmental constraints and the views of IP's.
Q1.3.5	Applicant National Grid Electricity Transmission	**Battery Energy Storage System (BESS)** In paragraph 6.4.3 of ES Chapter 6, it states that: "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." Questions are as follows – 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	1) Battery Storage was briefly considered by the Applicant but was ruled out for a number of reasons including: BESS would require additional land to generate electricity for charging the batteries or reduction in grid connection capacity, both of which did not seem feasible or commercially attractive; it may further introduce a large built form into the site, possibly within the Green Belt, which the Applicant considered to be disadvantageous in planning terms; that the installation layout submitted was an efficient one, making good use of the land and being co-located with the agricultural use of land beneath the solar panels; and ultimately the Applicant knew that whilst balancing the Grid is ultimately the responsibility of National Grid, there were other BESS schemes existing or emerging within the area that could assist in that regard (refer to list of cumulative developments [APP-244] which highlight battery/BESS schemes nearby. Having analysed previous DCO project applications it appeared that batteries were of particular concern to the public in such projects. 2) This was not investigated as it was not considered relevant to how a site search should be undertaken in policy terms i.e. there is no policy requiring a co-location of BESS with solar. This was not a factor that influenced the site search, nor an alternative considered by the Applicant.

ExQ1	Question to	Question	Applicant's Response
		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? 6) If BESS is provided elsewhere 'including' the Cowley substation, what other destinations are anticipated to be used for electricity storage?	3) The Applicant is aware that land to the west of its southern site is being considered for BESS by the landowner but its precise status is unknown (but does not form part of APP-244]. 4) The 400 kV National Grid Substation will feature key components for transformation, protection, switching, and interconnection. For switching and safety, a 3-Phase Earth Switch and Gas-to-Air bushings will enable secure grounding and transitions between gas- and air-insulated sections. The substation will utilize a Gas-Insulated Busbar (GIB) for compact power distribution, with Cable Sealing Ends and a Line Gantry managing underground and overhead connections. Capacitor Voltage Transformers (CVTs) will support metering, protection, and communication functions. The apparatus and supporting infrastructure will include essential systems for power distribution, control, and site operations. Cabling and cable trench systems will provide electrical and control interconnections across the substation. Control buildings will house protection relays, control panels, and communication equipment. For site security, fencing with CCTV and access control will be installed. Internal access roads and hardstanding areas will facilitate equipment installation and maintenance activities. Drainage and foundation systems, including oil interceptors, bunds, and concrete plinths, will ensure structural integrity and environmental protection. Finally, auxiliary power systems will support LV distribution, emergency lighting, and critical backup through battery banks.

ExQ1	Question to	Question	Applicant's Response
			The final technical configuration will be determined by National Grid. These equipment and design parameters of the NGET substation are to be included in the Development Consent Order (DCO). 5) No, not to the Applicant's knowledge; 6) Other than those battery/BESS storage projects referred to in APP-244, the Applicant is not in a position to anticipate the answer to this question.
Project Alternatives			
Q1.3.6	Applicant National Grid Electricity Transmission Plc	**National Grid substation** 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. 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) The delivery of any consented NGET substation will be a matter for National Grid, not the Applicant. However, NGET and SolarFive Ltd have signed a Bilateral Connection Agreement which commits both sides to connect Botley West Solar Farm to the NETS in October 2028. The Applicant has paid securities to secure this connection agreement into its escrow account at NGET and is in regular contact with the appointed NGET connection delivery engineer. 2) This is a matter for National Grid to confirm.
Q1.3.7	Applicant	**Other substations and PCS units** 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.	The Applicant responded in its oral submission on this matter [**REP1 –0019**, pages 18 and 19]: *Mr LeCointe added that the locations of the substations, PCS units, and main substation shown on the illustrative masterplan were the result of an iterative process developed over several years. The layout evolved to minimise environmental effects while considering engineering constraints. For example, PCS units were repositioned to avoid public rights of way (PRoW) and reduce noise near sensitive receptors. Although not all combinations were documented due to the large number of possibilities, the layout reflects efforts to avoid or mitigate impacts in line with the mitigation hierarchy. The project has been assessed based on this optimised layout.*

ExQ1	Question to	Question	Applicant's Response
			Mr Trabelsi, on behalf of the Applicant, explained that in the detailed design, PCS units are placed to minimise transmission losses by locating them close to the modules and along maintenance roads for easy access in case of disturbance. The 165 PCS units are connected via 33 kV cables to secondary substations, where voltage is stepped up from 33 kV to 275 kV for long-distance transmission. Cables are placed near the edges of fields to reduce length, allow access for maintenance, and minimise visual and environmental impact. The locations of PCS units and secondary substations were optimised to reduce losses and disturbance. Whilst no express reference is given as to the matters considered, the Applicant can re-confirm that stated above.
Q1.3.8	Applicant	**Substations versus Best and Most Versatile Agricultural Land (BMV)** 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. 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.	Under the scenario whereby National Grid locate outside of the Applicants Order limits, and the freed up area is used for solar arrays, permanent loss of BMV will be avoided and land beneath the arrays would continue in agricultural use. The use of the land for solar arrays will not lead to a loss of any BMV. 1) With the National Grid substation relocated outside the Order limits, the Applicant reconfigured the site layout by moving the main substation and gained approximately 4.3 hectares of land. This area will now accommodate 10,726 additional PV modules, delivering an estimated 7 MWp of installed capacity. 2) While the 4.3 ha area is classified as BMV land, the use of this space for solar panels involves far less intrusive construction than a substation, resulting in a significantly lower and more reversible impact. When balanced against the additional 7 MWp of clean energy generation, the minimal disturbance supports the case that the benefits outweigh the limited harm to BMV land The use of this land for solar arrays would not cause the loss of BMV land. As Natural England note in their Written Representation submitted at D1, *"it is considered that as the solar panels would be secured to the ground by steel piles with limited soil disturbance, they could be removed in the future with no permanent loss of agricultural land quality, provided the appropriate soil management is employed and the development is undertaken to high standards. Consequently, Natural England advise that any grant of consent should be made subject to requirements to safeguard soil resources and agricultural land. We note that the draft DCO includes requirement 11 which incorporates the need for a soil management plan.*

ExQ1	Question to	Question	Applicant's Response
			It is assumed within the ES that the majority of the development will not lead to any permanent loss of agricultural land." An outline Soil Management Plan(SMP) (APP-233) to safeguard soil resources has been produced and a detailed SMP, based on the principles contained within the outline document will be produced in accordance within Requirement 11 within the draft DCO.
Q1.3.9	Tim Palmer	**Yield from solar panels** In your relevant representation [RR-1067], you refer to Perovskites PV Panels. Please explain what is known about these Perovskites PV panels. 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?	
Q1.3.10	Applicant	**Flexibility of Order limits** The dDCO, Works Plans and Land Plans allow for flexibility in cable routeing 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. 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?	The Applicant is continuing to narrow down or remove optionality around the four cable-route corridor areas. Routing choices are being refined through executive and detailed design, supported by both non-intrusive and intrusive technical studies, environmental and geotechnical surveys, and active land-owner negotiations. For example, at Bladon Heath (Option 3) a thermal study confirmed that dual 275 kV and multiple 33 kV circuits can fit within a constrained corridor by using bentonite-filled ducts, with follow-up surveys now planned; at Swinford Bridge (Option 4) the preferred, shorter alignment runs behind the Siemens facility, and discussions are under way to secure access while completing technical and environmental assessments. This iterative process will continue to eliminate unnecessary variants, but any formal request to remove residual optionality from the Order limits is unlikely until the outstanding surveys and agreements are concluded, which is expected in the post-DCO phase.
Q1.3.11	Applicant	**Mineral and waste resources** The ExA notes that, in respect of sensitive archaeology deposits, the Applicant has chosen to avoid or exclude the relevant land from Order	1. The proposed solar farm infrastructure covers approximately 119 ha of the mineral safeguarding area. However, approximately 2.7 ha of land within the mineral safeguarding area is intended to be removed from the proposed infrastructure area as part of a formal change request. A plan is provided in

ExQ1	Question to	Question	Applicant's Response
		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: 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?	the Appendix to illustrate the mineral safeguarding area, and the extent of the development in relation to it [**EN010147/APP/12.2 Appendix 4** Fig 11.2 a, b, & c.]; 2. Proposed infrastructure is not located within the footprint of the potentially infilled sand pits at Purwell Farm. Ground investigation will be undertaken in areas of higher potential contamination risk (Commitment 11.2) and should the findings determine remediation is required a remediation strategy would be prepared (Commitment 11.3.). The ground investigation at Hensington Railway cutting landfill will inform the appropriate construction methodology i.e. open cut trenching, micro drilling or Horizontal Directional Drill. The outline Construction Code of Practice (oCoCP) [**APP-232 & 233**] the outline Operational Management Plan [**APP-234]** and the outline Decommissioning Plan [**APP-236**] will all be developed further, and subject to the discharge of requirements associated with the DCO, to identify, manage and avoid risks of pollution to land and water resources during construction, operation and decommissioning. 3. The Applicant has considered three options for crossing the landfill site at Hensington Railway cutting for the cable route, namely open cut trenching, micro drilling or Horizonal directional Drilling (HDD). Site surveys and investigation will be undertaken, to establish if there are any contaminants of concern in the location of the cable route at Hensington cutting. If there are no contaminants of concern the open cut trench technique will be utilised. If contaminants of concern are identified in the surface soil/subsoils the micro drilling technique will be utilised. If the contaminants of concern are identified at greater depth, then HDD drilling can be used to a suitable depth to avoid any contaminated materials.
General Considerations for Alternatives			
Q1.3.12	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	The Applicant decided for its first consultation exercise in November 2022 to prepare a Preliminary Masterplan layout which included what was described as 'Opportunities for Enhancement and Mitigation' areas, or buffer zones, around sensitive receptors [see for example consultation material at APP-026]. At that stage the Applicant knew it needed to seek to protect amenity/reduce landscape and visual effects, protect tress and hedgerows and woodland, conservation areas, river corridors, stay away from flood zones etc as well as have regard to the issue of openness of the Green Belt and the need to create sufficient areas of

ExQ1	Question to	Question	Applicant's Response
		distances requested by IPs would be disadvantageous to the project.	land to generate a good level of BNG (the calculations of which had not been confirmed at that time). As a minimum, it was decided between the Applicant planning and landscape Architect teams, to impose a minimum buffer zone of 25m from residential properties. This distance was a professional judgement based on extensive experience (there is no such thing as scientific reasoning in this situation in planning terms) as to what was likely to be considered reasonable to avoid or reduce adverse effects and to be consistent – we needed a clear rationale if we were to vary that distance otherwise accommodating one IP's request to increase the buffer, would have been considered unfair if we then did not apply that increase to every other residential receptor. Sometimes that buffer was increased if it also coincided with the need to leave land free from development in or near a conservation area, avoid flood zone or some other constraint. The Applicant was also aware, as they continued to refine the design, that they may need to adjust these buffers in individual circumstances if it was clearly justified. For example, the landscape architect was aware that in some case they may need to consider applying a Residential Visual Amenity Assessment (RVAA), if it was judged to be necessary. To date, that has not been triggered/judged to be necessary. In some cases too, additional landscaping was proposed to help screen the solar arrays from sensitive receptors. The effect upon the project of increasing these minimum buffer distances from residential properties will vary - in some cases in will further increase areas for BNG for example (which the Applicant already has a considerable excess above that which is likely to required for NSIP projects), and/or reduce areas of installation, which will place pressure on electrical output and potentially reduce the amount of renewable energy the project is able to deliver. The Applicant has taken a reasonable approach based of professional judgement and based on experience; it has not run a scenario whereby such a minimum distance is increased. The Applicant would also ask the ExA to bear in mind that they continue to try to accommodate IP's concerns, and are intending to make further adjustments to the installation areas in a second Change Request. This includes removing significant areas of installation south of Bladon to reach agreement on suitable protection for the WHS. The Applicant is also about to reach agreement with the Oxford Airport which involves a further reduction in installation areas. These adjustments may also have the effect of increasing the distances from some residential receptors.

ExQ1	Question to	Question	Applicant's Response
Q1.3.13	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.	See the Applicant response to Q.1.3.12 above. The Applicant does not consider this to be an appropriate exercise to be undertaken as it will only respond to those who have expressed such a preference and would potentially ignore many others who may wish for the same but have not (to date) expressed such a preference. With respect, that approach is a flawed one and potentially unfair. If the Applicant is to produce such a plan, however, does the ExA have a list of IP's which they would wish the Applicant to address.
Q1.3.14	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	If the NGET substation is delivered within the DCO Order Limits, the substation footprint would be located approximately 150 to 250 m from the Farmoor Reservoir embankment. If the NGET substation is delivered outside and adjacent to the site, in land south of the reservoir, it could be located approximately 80 to 100 metres from the embankment (although this is a best guess from the Applicant and a more precise estimate would require National Grid to confirm).

2.4 Q1.4 Climate Change

ExQ1	Question to	Question	Applicant's Response
Assessments and Calculations			
Q1.4.1	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.	Table 14.9 of the climate change chapter [**APP-051**] includes a list of project elements which have been included within the maximum design scenario for the greenhouse gas (GHG) assessment. All major materials for the Project were included as part of the scope of assessment. As is referenced in paragraph 14.9.2 the assessment has included consideration of life cycle assessment stages A1-A5 which includes the extraction, processing, delivery and construction processes for all material specified within Table 14.9 maximum design scenario. As such, emissions associated with the manufacture, transport and installation have been considered.

ExQ1	Question to	Question	Applicant's Response
			As a final point, the decommissioning stage effects (disposal) have been presented in paragraphs 14.9.53-14.9.63 which considers the emissions associated with the PV modules, PV module frames and inverters
Q1.4.2	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?	The performance of the solar PV panels will be monitored using approximately 50 to 60 pyranometers installed on panel frames or adjacent poles to measure solar irradiance as mentioned in Chapter 6: Project Description [**APP-043**] (Section 6.4.6, Table 6.3,). These, combined with 156 Power Converter Stations (PCS) housing inverters and monitoring systems (Section 6.4.12), will enable performance data collection for specific groups of panels. This infrastructure ensures that underperformance can be detected at a granular level.
Q1.4.3	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?	The detailed CoCP will include a Pollution Prevention Plan which will include information for managing surface water runoff during construction and protective measures to control the risk of pollution to groundwater during construction and operation phases of the Project. The Applicant proposes that the PV panels will be naturally cleaned by the rain and that no separate water supply, or use of solvents, is required for cleaning.
Q1.4.4	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?	The Outline Operational Management Plan section 2 Operational Environmental Management, section 2.2.1 states that maintenance and servicing would include inspection, removal, reconstruction, refurbishment, or replacement of faulty or broken equipment, to ensure the continued effective operation of the Project. An Operational Waste Management Plan (OWMP) will be prepared and agreed with the relevant waste planning authority prior to construction commencing. The Waste Management Plan will set out the measures for managing waste during the operations and maintenance phase. All waste generated during the operation and maintenance phase of the Project will be managed in accordance with the waste hierarchy principle and duty of care requirements. Replacement PV modules will be recovered and recycled by an authorised reprocessor as required by the WEEE Regulations 2013. This will be done in accordance with 'Best Available Treatment, Recovery and Recycling Techniques and will be undertaken by an authorised reprocessor. A list of authorised reprocessors will be established prior to the operational phase of the Project and kept up to date during operation.

ExQ1	Question to	Question	Applicant's Response
			The applicant is aware that specific recycling facilities photovoltaic panels within the UK. Such a facility would be used for recycling of PV panels throughout the operational and decommissioning process. The Applicant confirms that damaged photovoltaic panels would be removed from site and recycled by an authorised processor as required by the WEEE Regulations 2013 (as amended). Photovoltaic panels are listed under category 14 of the WEEE Regulations, which seek to reduce the amount of WEEE incinerated or sent to landfill.
Q1.4.5	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.	The negative emissions reported in Table 14.16 [**APP-051**] are correct. As is noted in paragraph 14.9.3 of Chapter 14 (**APP-051**); *"Additional to GHG emissions associated with life cycle stages A1 – C4 are D stage GHG emissions. D stage falls beyond the product life cycle and encompasses benefits and loads beyond the system boundary. This includes reuse, recovery, or any recycling potential of materials which may reduce the overall embodied carbon footprint of a material once this stage is accounted for."* Furthermore, the D stage or decommissioning phase emissions associated with in particular the PV panels assumes a benefit (i.e. a reduction in future applications of material components) through the reuse or recycling and avoided virgin materials.
Q1.4.6	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?	The Greenhouse Gas Calculations Appendix 14.2 (**APP-215**) states "Both relevant EPD's state a reference service life (RSL) of 25 years (PV Modules) and 20 years (PCS inverters), respectively. As such it is anticipated that both the PV modules and inverters will need to be replaced once during the operational phase of the Project (37.5 years). It is assumed that this has taken place by year 26 of the Project's operation. This has been presented in paragraph 14.6.6 of The Greenhouse Gas Calculations Appendix 14.2 (**APP-215**) confirming the emissions related to replacement of PCV modules and Inverters.
Impacts of Climate Change			
Q1.4.7	Applicant	**Microclimate** 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. Has the applicant assessed the potential creation of microclimates and their impact on the surroundings? If such an assessment has been carried out, provide	Chapter 16 **[APP-053]** section 16.6 includes considering the future baseline associated with climate change and section 16.9 includes assessment in relation to climate change and adaptation. The assessment concludes that the Project's renewable energy provides a positive contribution to reducing the health effects associated with climate change, locally, nationally and internationally. With regard to ultra-violet radiation, although some reflection occurs from solar panels, the primary role of solar panels is absorption not reflection. There is not considered to be the potential for a likely significant population health effect on this issue and as such it has not been scoped into the Environmental Statement. A glint and glare study is included in Appendix 4.4 of the Environmental Statement [**APP-**

ExQ1	Question to	Question	Applicant's Response
		justification and evidence of any conclusions reached.	**128**]. That assessment relates to the visible light spectrum but also demonstrates that other reflected naturally occurring solar radiation would not significantly affect dwellings, including due to new and existing screening. With regard to the issue of heat island effects and microclimates, the scientific literature on this issue is sparse and the available evidence indicates that any effect is likely to be relatively small and geographically limited in the contexts relevant to this project (Fthenakis and Yu 2013). The studies that tend to identify solar health island effects tend to be from arid or desert contexts (Barron-Gafford et al 2016), with the greatest temperature variations being at night and within the array areas. Recent studies show solar farms may have a cooling effect (Xu et al., 2024). The role of vegetation, including the Projects planting of trees and hedgerows is likely to contribute to cooling and shade for those passing through array areas. There is not considered to be the potential for a likely significant population health effect on this issue and as such it has not been scoped into the Environmental Statement.

2.5 Q1.5 Compulsory Acquisition

ExQ1	Question to	Question	Applicant's Response
Overarching Case			
Q1.5.1	Applicant	**Compulsory Acquisition (CA) Schedule** 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.	An updated copy of the CA Schedule and Land Rights Tracker will be provided at each deadline with detail of the progress made with each affected party between deadlines highlighted as a tracked change.
Q1.5.2	Applicant	**Compliance with Department for Communities and Local Government Guidance**	The Applicant confirms that the Book of Reference (BoR) **[APP-023]** is compliant with the guidance specified, specifically Annex D of that guidance. We draw attention to the most recent submission of the BoR at Deadline 1 [**REP1-010**]

ExQ1	Question to	Question	Applicant's Response
		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.	which supersedes the Application version [**APP-023**], and Additional Submission versions **[AS-017 and AS-028],** and likewise confirms compliance with the DCLG's guidance at paragraph 1.1.7.
Q1.5.3	Applicant	**Diligent Enquiry into Land Interests** 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?	The Applicant's Agent have conducted multiple rounds of diligent enquiry including desktop land referencing, contact referencing, contacting adjacent landowners, site inspections, and the erection of site notices to identify unknown land interests. In addition, the Applicant and their Agent have contacted local Parish Councils to identify ownership. The erection of site notices for pre-application statutory consultation were undertaken to establish ownership and fulfil the Applicant's statutory obligations. Further site notices were erected at the section 56 stage to notify unknown interests of the acceptance of the application in accordance with section 230 of the Planning Act 2008. Further communications with adjacent landowners or potentially interested parties have taken place; and Land Registry has been checked regularly for any updates to land registration. In a continued effort to identify unknown ownerships, diligent enquiry will be continued utilising the following methods: Land Registry refresh, communication with stakeholders, erection of notices and site visits.
Q1.5.4	Applicant	**Diligent Enquiry into Land Interests** Do you envisage any changes to the application which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010?	The Applicant does not intend to make any changes to the application at this stage that would engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010.
Q1.5.5	Applicant	**Reasonable Alternatives to Compulsory Acquisition** In the light of the CA Guidance, in particular paragraph 8: 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/	Chapter 5 of the ES **[APP-042]** sets out the Applicant's consideration of alternatives for the Project that has informed the consideration of alternatives for compulsory acquisition. Alternatives were considered in terms of: • The implications of the "Do-Nothing" Scenario • Site Location and Scale • Site Layout and Design • Choice of Solar Array • Cable Corridor Route

ExQ1	Question to	Question	Applicant's Response
		comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.	The starting point in site selection was to identify areas of available land near a grid connection point that had available capacity. Chapter 5 steps through the site selection process in identifying potential grid connection points and the identification of available land around grid connections. Negotiation with willing landowners, while not the only reason for selecting the chosen site, was a core part of the process in identifying available land, in addition to ensuring that potential effects could be managed in accordance with the effects management hierarchy. As set out in the Statement of Reasons at Section 5 **[APP-021],** a nuanced approach was taken by the Applicant in determining the CA powers required for the Project. Relevant freehold interests and other rights over land required have been sought by agreement with landowners, as summarised in the Land and Rights Negotiations Tracker [REP1-008]. Even where land is secured by agreement, it is necessary for the Applicant to seek corresponding CA powers to protect against a scenario where contracts are not adhered to or are otherwise set aside. Rights have been sought by the Applicant in a proportionate manner, with temporary possession and suspension of private rights or restrictive covenants for periods only where the Applicant is in lawful possession of the land. The Applicant has only included powers to compulsorily acquire the freehold interest in land where other powers (such as to acquire new rights or take temporary possession) would not be sufficient or appropriate to enable the construction, operation or maintenance of the Project. For example, as set out in the Land Plans **[AS-006],** freehold rights are not sought in cabling areas on the basis that, once cabling is installed, limited rights are required by the Applicant in these areas. By contrast, Solar PV Areas may require acquisition of freehold rights where landowners do not grant a lease of the land in accordance with the terms of the completed option agreements. Sections 7.5, 7.6, 7.7 and 7.8 of the Statement of Reasons **[APP-021]** then outline further detail on the various matters that have informed the Applicant's assessment of alternatives to compulsory acquisition, underpinned by the assessment of alternatives to the Project, and the site selection process.
Q1.5.6	Applicant	**Reasonable Alternatives to Compulsory Acquisition** Paragraph 25 of the CA Guidance states that applicants should seek to acquire land by	1) The Applicant has sought, where possible, to have meaningful discussions with Land Interests affected by the proposed development, with details of the discussions with those relevant parties can be seen in the Land and Rights Negotiation Tracker [**REP1-008].**

ExQ1	Question to	Question	Applicant's Response
		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. 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?	Discussions remain ongoing with relevant Land Interests along the cable route, and it is The Applicants intention that where possible, and acceptable to the Land Interest that a voluntary agreement will be sought. While details of any commercial agreement cannot be shared, The Applicant has sought to agree terms with the Parties at a market rate for an Easement, in addition to covering Affected Parties proper and reasonably incurred agency and legal costing associated with the matter. The Applicant will continue to engage with the parties through Examination to secure an agreement where possible. Where it has not been possible to secure an agreement, such as where the Land Interest is not willing to engage, then The Applicant will continue to correspond with the Interested Party throughout the Examination Process to give them the opportunity to agree terms. Where a Land Interest details are not known, such as over unregistered land, then The Applicant will continue to make diligent enquiries to identify such interests. 2) To date, there has been no requirement to offer full access to alternative dispute resolution (ADR) techniques as no Interested Party has raised concerns over CA of their Land. The Applicant does not consider it necessary or appropriate at this stage of negotiations to offer any form of dispute resolution which could disrupt ongoing negotiations. The Applicant will continue to negotiate land agreements where possible with the intention of securing agreements voluntarily. In the event concerns or issues are raised by Affected Parties which are suitable for ADR, such as mediation, The Applicant will consider the requests and whether it is appropriate to promote meditation as an option with the Affected Party.
Q1.5.7	Applicant	**Accuracy of the Book of Reference, Land Plans and Points of Clarification** 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?	The Applicant has undertaken a thorough land referencing process through the pre-application period of the proposed scheme to ensure that all affected parties are identified, consulted and listed where necessary in the Book of Reference, the most recent version being submitted at Deadline 1 [REP1-010]. The categories of affected parties identified and the land referencing methodology used to identify the affected parties with an interest in land are described in the Consultation Report [APP-024] and Statement of Reasons [APP-021]. This methodology was utilised to ensure diligent inquiry was undertaken in the identification process, as required under section 44 of the Planning Act 2008. The accuracy of the affected parties found is underpinned by the fact that many sources of information have been used to ensure diligent inquiry is undertaken. This includes, but not limited to, access to public records (HM Land Registry, Companies House, local highway records) and through contact referencing by way of land interest questionnaires and ongoing engagement with affected parties. As the proposed scheme has

ExQ1	Question to	Question	Applicant's Response
			evolved through several rounds of formal and informal consultation, the refresh of landowner information has been undertaken at regular intervals and ahead of any consultation start points, as well as shortly before submission of the DCO application so that any newly identified affected parties can be notified and engaged with at the earliest possible opportunity. This has been undertaken through the use of Edition Date Checks, Search of the Index Map (SIM) and address verification tools (TraceIQ, Companies House, Charities Register, Mutuals Register etc.). New parties found were made aware of the current project stage by issuing either a section 42 or 56 letter (depending on the stage of the proposed scheme) and further land interest questionnaires issued as necessary. As ownership of land is fluid and affected interests can change over time, it is likely a number of changes will occur (including identification of new parties or updates to existing parties' details). To date, a number of updates to affected parties' details have been found, including confirmation of ownership of some unknown plots listed in the Book of Reference [REP1-010]. A live updated version of the Book of Reference is being maintained by the Applicant alongside a Schedule of Changes to the Book of Reference, both of which will be submitted at Deadline 3 and Deadline 7, as directed by the ExA within the Annex A (Examination Timetable) of the Rule 8 Letter [PD-007], or should any significant changes to land ownership be identified, at the next available deadline. The Applicant is continuing to engage with affected parties through its appointed Land Agents. Any changes in ownership or occupancy that are identified will be passed through to the land referencing team to update the Book of Reference accordingly. The Applicant will continue to review the Land Registry and any changes to ownership/occupancy through the use of Edition Date Checks, Search of the Index Map (SIM) and address verification tools (TraceIQ, Companies House, Charities Register, Mutuals Register etc.). These will be shown in updated versions of the Book of Reference and Land Plans as required/requested through the Examination process.
Q1.5.8	Affected Persons IPs	**Accuracy of the Book of Reference, Land Plans and Points of Clarification** 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.	

ExQ1	Question to	Question	Applicant's Response
Q1.5.9	Applicant	**Scope and Purpose of Compulsory Acquisition Powers** 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. Please explain in further detail: 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. 4) What alternatives to this approach have been explored?	1) While the Applicant has undertaken reasonable endeavours to identify relevant private easements and other rights that may affect its ability to implement the Project, the powers must be sufficiently broad to ensure that, in the unlikely event that private rights are identified that are incompatible with the delivery of the Project, that the Applicant can still rely on the DCO with certainty that the Project can be delivered. 2) Where possible the Applicant has sought voluntary landowner agreements for land within the Order Limits, but even where such agreements have been secured, the DCO must include relevant CA powers over land required for the Project, to ensure certainty of delivery. This protects the Applicant in the event that landowner agreements cannot provide for the delivery of the Project. 3) Given the narrow construction timeframe in order to meet the grid connection date, any delays have the potential to be significant, or even fatal to the Project. 4) The approach to securing individual landowner agreements is intended to enable the Applicant to deliver the Project while minimising the use of CA powers as much as possible. This is typical of solar DCO projects.
Q1.5.10	Applicant	**Scope and Purpose of Compulsory Acquisition Powers** 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. 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. How would it be ensured that powers of CA would not be exercised in respect of land not ultimately	All land identified within the Order Limits is required for the Project. Requirement 5 of the Draft DCO sets out the types of matters that will be considered at detailed design stage, which include the layout, scale, finished ground levels, and external appearance of Project components. These are not matters that are anticipated to result in a reduction in the Order Limits at a later stage. Irrespective, compulsory acquisition powers under Article 19 (subject to the other Articles listed in Article 19) of the Draft DCO only allow the Applicant to compulsorily acquire "*so much of the Order land as is required for the authorised development or to facilitate, or is as incidental, to it*". Should the detailed design

ExQ1	Question to	Question	Applicant's Response
		required as a result of the detailed design process?	process confirm that land in the Order Limits is no longer required for the Project, the Applicant would be unable to exercise CA powers on that land under Article 19.
Q1.5.11	Applicant	**Whether a Compelling Case in the Public Interest Exists** 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. 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) The Statement of Reasons explains that appropriate compensation would be available to those entitled to claim it under the relevant provisions of the national Compensation Code thereby minimising the private loss (para 7.4.1). Compulsory purchase compensation aims to ensure that those affected are put in the same position as if their land had not been taken from them. The Applicant has assessed the potential level of compensation to be payable for this Project as part of the Project cost estimate at section 5 of the Funding Statement [**APP-022**]. Specifically, paragraph 5.2 states: "*This cost estimate covers all aspects of the Project and includes construction costs, preparation costs, supervision costs and land acquisition costs (including compensation payable in respect of any compulsory acquisition), equipment purchase, installation, commissioning and power export. The estimate also includes an allowance for inflation and project contingencies*" (our emphasis). This assessment therefore ensures that the Applicant has sufficient funding available to meet the required compensation to minimise private loss. 2) The Planning Supporting Statement [**REP1-012**] sets out the need for the Project as Critical National Priority infrastructure. The Project will, if consented, contribute a significant generation capacity towards the Government's current targets, as explained at section 6 of the Statement of Reasons. This support for the Project as a solar NSIP is supported primarily through the clear need case set out in the National Policy NPS EN-1 and NPS EN-3. In addition to meeting the urgent national need for secure and affordable low carbon energy infrastructure, the Project will deliver other public benefits, including: • Biodiversity net gain; • Employment; • PRoW and permissive paths; and • Landscape enhancement. These public benefits have been balanced against any private loss through an iterative design process which allows the Applicant to seek the consent for the Project whilst minimising potential impacts. For example, as part of Change Request 1 [**CR1-007**], the Applicant removed Plot 6-17 on the basis that an

ExQ1	Question to	Question	Applicant's Response
			Affected Person did not want that land included within the Project. This change therefore sought to reduce private loss whilst achieving the public benefit of the renewable energy generation. As such, any private loss that would now arise as a result of the Project has now been reduced to a level that the Applicant considers acceptable in light of the benefit to be achieved. In any event, the compensation would then act as a fall back remedy in the event private loss arose. The Applicant notes that compulsory acquisition powers of a similar nature have been awarded unanimously across all granted solar DCOs – for example, most recently the East Yorkshire Solar Farm Order 2025, Heckington Fen Solar Farm 2025 and West Burton Solar Project 2025. Earlier solar DCOs also include similar powers, despite not being able to rely on the latest NPSs which have heightened support in favour of solar NSIP development. This supports that there is a strong case in favour of the public benefit arising from this Project in light of existing national policy.
Q1.5.12	Applicant	**Whether a Compelling Case in the Public Interest Exists** 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. Please provide further details, with examples where available: 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? 3) Please provide detail, where available, of the direct and indirect impacts thereby identified.	The Consultation Report [**APP-024**] sets out details of targeted consultation exercises that were carried out in response to consultee feedback pre-application, as well as setting out how consultation feedback has informed the design of the Project. Since submission, the Application submitted Change Request 1 [**CR1-007]** as a result of its ongoing iterative design process. Specifically, this included Change 1 (Small reduction in redline to remove an access) which was the result of the Applicant's willingness to refine the Order Limits to ensure that only land that is necessary to deliver the Project is included. In summary, initially the Applicant was seeking to obtain construction and operational access to two fields to the West and South of Mill Farm. However, the owners of Mill Farm asked the Applicant not to use this access as it crossed the Mill Farm access road and required the widening of a hedgerow. After ongoing engagement with the owners of Mill Farm, the Applicant reviewed its other options in more detail and decided to remove this access (plot 6-17), as there is a suitable alternative further south on Lower Road. Most recently, the Applicant has submitted a Change Request 2 notification alongside this Deadline 2 submission which includes various changes being proposed in response to ongoing engagement, to either reduce the Order limits or implement certain scheme refinements. For example, the Applicant is proposing to reduce the redline along Wharf Road (to minimise potential impact and potential private loss for Siemens as landowner) and to reduce the redline near to Oxford Airport (to minimise potential impact in light of safety concerns). This demonstrates

ExQ1	Question to	Question	Applicant's Response
			the ongoing willingness of the Applicant to refine the scheme as part of its iterative design process. The Applicant continues to engage with all landowners and statutory undertakers, as set out in the Land and Rights Negotiations Tracker. The Applicant's preference remains to address any concerns through voluntary agreement to avoid the need to rely on compulsory acquisition powers.
Q1.5.13	Applicant	**Whether a Compelling Case in the Public Interest Exists** 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?	As set out in response to point 1 of ExQ1.5.11, the Statement of Reasons explains that appropriate compensation would be available to those entitled to claim it under the relevant provisions of the national Compensation Code (para 7.4.1). The Applicant has assessed the potential level of compensation to be payable for this Project as part of the Project cost estimate at section 5 of the Funding Statement [**APP-022**]. Specifically, paragraph 5.2 states: "*This cost estimate covers all aspects of the Project and includes construction costs, preparation costs, supervision costs and land acquisition costs (including compensation payable in respect of any compulsory acquisition), equipment purchase, installation, commissioning and power export. The estimate also includes an allowance for inflation and project contingencies*" (our emphasis). As such, whilst the scheme has been designed and continues to evolve to minimise private loss, the Applicant has directly recognised the role of compensation in remedying any potential private loss that may arise.
Q1.5.14	Applicant	**Justification for Interfering with Human Rights of those with an Interest in the Land Affected** 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?	Section 9 of the Statement of Reasons [**AS-015**] considers the potential of the Order to infringe human rights and the Secretary of State's duty to consider this. At section 9.4, the Applicant recognises that the Order has the potential to infringe the human rights of persons who own property or have interests in the land proposed to be acquired pursuant to the Order. Such an infringement is authorised by law so long as: • the statutory procedures for making the Order are followed and there is a compelling case in the public interest for the inclusion of powers of compulsory acquisition in the Order; and • the interference with the convention right is proportionate The existing use of land is therefore not directly required to be considered under the appropriate test(s). However, the Applicant recognises that the existing use of land may impact a conclusion as to whether there is a compelling case in the public interest for the

ExQ1	Question to	Question	Applicant's Response
			inclusion of compulsory acquisition of any such land and in determining whether any interference is proportionate. The Applicant has therefore considered existing use as part of its application, including: 1. Design – for example section 9.6 of the Statement of Reasons confirms that the Order limits do not include, and the Project does not require, the outright acquisition of any residential dwelling house; and 2. Environmental assessment (see below). In determining the public health effects of the changes in land use, local health priorities for the OCC Joint Strategic Needs Assessment 2024 are identified as important (Chapter 16 [**APP-053**] paragraph 16.2.13). Relevant priorities include: addressing unhealthy weight, opportunities for physical activity; and reducing the effects of climate change on people's health. Chapter 16 [**APP-053**] paragraph 16.2.14 also quotes the Woodstock Neighbourhood Plan 2020 – 2031 as part of the policy context that the assessment, which notes the importance of green space in relation to a number of factors, including local health and wellbeing. Chapter 16 **[APP-053**] section 16.9 includes specific assessment relevant to the land use, including: • Diet and nutrition; • Open space, leisure and play; • Climate change and adaptation; and • Wider societal infrastructure and resources. For diet and nutrition the importance of accessible healthy food is emphasised by the Oxfordshire County Council Director of Public Health annual report on Climate Change 2023-24 (Chapter 16 **[APP-053]** paragraph 16.2.18-19). The importance of diet in relation to healthy food production is picked up in the review of the scientific literature (paragraph 16.9.4) and the identification of relevant vulnerable groups within the assessment (paragraph 16.9.10 second bullet, second sub-bullet). The health assessment considers how the existing land is used in terms of its role in healthy local food markets. The assessment concludes there would be no significant adverse public health effect (paragraphs 16.9.13-15). Similarly for open space, leisure and play, Chapter 16 **[APP-053]** discusses the effects associated with use of public rights of way, particularly for local residents and surrounding villages. Specific detail is provided in Appendix 16.4 Human Health PRoW Analysis **[APP-222]**. The importance of such routes being maintained for the local communities, including inclusion of 'green ways' connecting villages has been

ExQ1	Question to	Question	Applicant's Response
			a focus of the health assessment, with a package of design and mitigation measures to reduce the adverse effects as far as practicable. Signposting to issues around health, mental health and access to open space and public rights of way, is set out in the Botley West Solar Farm Applicant Responses to Relevant Representations **[REP1-020]** (pdf page 74 of 545). The Chapter 16 **[APP-053]** assessments of the public health implications in relation to 'climate change and adaptation' and 'wider societal infrastructure and resources' discuss the important benefits of the changing land use to renewable energy production. These latter assessment notes the significant public health benefits from contributing to improved renewable energy security. Chapter 16 **[APP-053]** has therefore had regard to both the importance of both current and future land use and what this would mean in terms of beneficial and adverse public health effects. The proposed Project (which has been designed with existing use of land in mind) will be considered in light of the outcomes of the environmental assessment others (which consider existing land use), alongside the need case and relevant national and local policy for the Project set out in the Planning Supporting Statement [**REP1-012**] and Supplementary Statement of Need [**PDB-014**]. Each will form part of the planning balance to allow the Secretary of State to decide whether the appropriate tests have been met.
Q1.5.15	Applicant	**Justification for Interfering with the Human Rights of those with an Interest in the Land Affected** In relation to the Applicant's duties under section 149 of the Equalities Act 2010: 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) The Applicant notes that, while they themselves are not a public authority and therefore not subject to the Public Sector Equality Duty, the Secretary of State will be when determining whether to grant a DCO for the proposed scheme. Section 9 of the Statement of Reasons [**AS-015**] considers the potential of the Order to infringe human rights and the Secretary of State's duty to consider this. The Applicant has undertaken a thorough land referencing process through the pre-application period of the proposed scheme to ensure that all affected parties are identified, consulted and listed where necessary in the Book of Reference, the most recent version being submitted at Deadline 1 [**REP1-010**]. The categories of affected parties identified and the land referencing methodology used to identify the affected parties with an interest in land are described in the Consultation Report [**APP-024**] and Statement of Reasons [**APP-021**]. The Applicant recognises the characteristics defined as protected by the Equality Act 2010, and that these characteristics may inform how a party experiences or is affected by the proposed scheme. The Applicant has sought to undertake accessible

ExQ1	Question to	Question	Applicant's Response
			consultation during the pre-application phase of the proposed scheme. This includes consultation with potentially affected persons, as described in Section 8 of the Consultation Report [**APP-024**]. Through this consultation and engagement, the Applicant has provided opportunities for affected persons to notify the Applicant of any protected characteristics to be considered. As appropriate, the Environmental Assessment has also built in additional consideration of those with protected characteristics under the Equalities Act 2010. For example, relevant vulnerable population groups are considered within the assessment in Chapter 16 - Human Health [**APP-053**] (section 16.5). This includes "*People who suffer discrimination or other social disadvantage, including relevant protected characteristics under the Equality Act 2010 or groups who may experience low social status or social isolation for other reasons*". 2) Through the duration of the Pre-Application, Acceptance and Examination phase, The Applicant has carried out diligent enquiry with Persons with Interest in Land, and thus far has not been made aware or noted any Affected Persons who may be considered to have protected characteristics. The Applicant will continue to consult as necessary as potential new interests come to light and will note should any of them identify as having such a characteristic.
Q1.5.16	Applicant	**Justification for Interfering with the Human Rights of those with an Interest in the Land Affected** 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. 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?	Section 9 of the Statement of Reasons [**AS-015**] considers the potential of the Order to infringe human rights and the Secretary of State's duty to consider this. At section 9.4, the Applicant recognises that the Order has the potential to infringe the human rights of persons who own property or have interests in the land proposed to be acquired pursuant to the Order. Such an infringement is authorised by law so long as: • the statutory procedures for making the Order are followed and there is a compelling case in the public interest for the inclusion of powers of compulsory acquisition in the Order; and • the interference with the convention right is proportionate The existing use of land is therefore not directly required to be considered under the appropriate test(s). However, the Applicant recognises that the existing use of land may impact a conclusion as to whether there is a compelling case in the public interest for the inclusion of compulsory acquisition of any such land and in determining whether any
Q1.5.17	Applicant	**Justification for Interfering with the Human Rights of those with an Interest in the Land Affected**	

ExQ1	Question to	Question	Applicant's Response
		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. 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? 1) How has the proportionality test been undertaken? 2) Explain further the proportionate approach which has been taken in relation to each plot?	interference is proportionate. The Applicant has therefore considered existing use as part of its application, including: 1) Design – for example section 9.6 of the Statement of Reasons confirms that the Order limits do not include, and the Project does not require, the outright acquisition of any residential dwelling house; and 2) Environmental assessment (see below). In determining the public health effects of the changes in land use, local health priorities for the OCC Joint Strategic Needs Assessment 2024 are identified as important (Chapter 16 [**APP-053**] paragraph 16.2.13). Relevant priorities include: addressing unhealthy weight, opportunities for physical activity; and reducing the effects of climate change on people's health. Chapter 16 [**APP-053**] paragraph 16.2.14 also quotes the Woodstock Neighbourhood Plan 2020 – 2031 as part of the policy context that the assessment, which notes the importance of green space in relation to a number of factors, including local health and wellbeing. Chapter 16 **[APP-053]** section 16.9 includes specific assessment relevant to the land use, including: • Diet and nutrition; • Open space, leisure and play; • Climate change and adaptation; and • Wider societal infrastructure and resources. For diet and nutrition the importance of accessible healthy food is emphasised by the Oxfordshire County Council Director of Public Health annual report on Climate Change 2023-24 (Chapter 16 **[APP-053]** paragraph 16.2.18-19). The importance of diet in relation to healthy food production is picked up in the review of the scientific literature (paragraph 16.9.4) and the identification of relevant vulnerable groups within the assessment (paragraph 16.9.10 second bullet, second sub-bullet). The health assessment considers how the existing land is used in terms of its role in healthy local food markets. The assessment concludes there would be no significant adverse public health effect (paragraphs 16.9.13-15). Similarly for open space, leisure and play, Chapter 16 **[APP-053]** discusses the effects associated with use of public rights of way, particularly for local residents and surrounding villages. Specific detail is provided in Appendix 16.4 Human Health PRoW Analysis **[APP-222]**. The importance of such routes being maintained for the local communities, including inclusion of 'green ways' connecting villages has been

ExQ1	Question to	Question	Applicant's Response
			a focus of the health assessment, with a package of design and mitigation measures to reduce the adverse effects as far as practicable. Signposting to issues around health, mental health and access to open space and public rights of way, is set out in the Botley West Solar Farm Applicant Responses to Relevant Representations **[REP1-020]** (pdf page 74 of 545). The Chapter 16 **[APP-053]** assessments of the public health implications in relation to 'climate change and adaptation' and 'wider societal infrastructure and resources' discuss the important benefits of the changing land use to renewable energy production. These latter assessment notes the significant public health benefits from contributing to improved renewable energy security. Chapter 16 **[APP-053]** has therefore had regard to both the importance of both current and future land use and what this would mean in terms of beneficial and adverse public health effects. The proposed Project (which has been designed with existing use of land in mind) will be considered in light of the outcomes of the environmental assessment others (which consider existing land use), alongside the need case and relevant national and local policy for the Project set out in the Planning Supporting Statement [**REP1-012**] and Supplementary Statement of Need [**PDB-014**]. Each will form part of the planning balance to allow the Secretary of State to decide whether the appropriate tests have been met.
Q1.5.18	Applicant	**Scope and Purpose of the Compulsory Acquisition Powers** 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. Provide justification for a 14-day notice period and consider whether this is unreasonably short and should be extended to 28 days?	Under the Housing and Planning Act 2016, when issuing notice to enter and survey land under section 174 the minimum statutory requirement is 14 days. That approach is consistent with the Housing and Planning Act 2016, and other recently consented solar DCOs such as East Yorkshire.

ExQ1	Question to	Question	Applicant's Response
Q1.5.19	Applicant	**Scope and Purpose of the Compulsory Acquisition Powers** 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. 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?	Column (2) of the table in Schedule 9 (*Land In Which Only New Rights Etc. May Be Acquired*) sets out the purposes for which rights over land may be required and restrictive covenants imposed. This cross-refers to access rights and/or cable rights, terms as defined in paragraph 1 of Schedule 9. Sub-paragraph (f) of 'access rights' states: "*restrict and remove the erection of buildings or structures, restrict the altering of ground levels, restrict and remove the planting of trees or carrying out operations or actions (including but not limited to blasting and piling) which may obstruct, interrupt or interfere with the exercise of the rights or damage the authorised development*" Sub-paragraph (g) of 'cable rights' states: "*restrict and remove the erection of buildings or structures, restrict the altering of ground levels, restrict and remove vegetation and restrict the planting of trees or carrying out operations or actions (including but not limited to blasting and piling) which may obstruct, interrupt or interfere with the exercise of the rights or damage the authorised development*" If the Applicant were to exercise its power of compulsory acquisition, this wording would be captured directly into any General Vesting Declaration or, if a Notice to Treat was to be served then this wording would form the basis of discussions for the parties to agree the wording. The Applicant does not consider consultation to be required because this wording is already publicly available and open to comment, plus it follows the well precedented wording used in other solar DCOs in relation to similar powers. For example, see The East Yorkshire Solar Farm Order 2025, The West Burton Solar Project Order 2025 and the Cottam Solar Project Order 2025.
Q1.5.20	All local authorities	**Scope and Purpose of the Compulsory Acquisition Powers** Are you aware of: 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.	

ExQ1	Question to	Question	Applicant's Response
Q1.5.21	Applicant	**Whether Adequate Funding is Available** 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 agreed to make fi*nanc*ial contributions or to underwrite the scheme, and the basis upon which any such contributions or underwriting is to be made.	Indirect financial contributions to Solar Farms are granted by way of Contracts for Differences, which are operated by the Low Carbon Contracts Company, a private limited company, owned and supported by the Secretary of State for Energy Security and Net Zero. While in the past the degree of support was published, as of the Allocation Round 7, starting this summer, the budget notice will be published only after the contract allocation process. Furthermore, the project will be funded by third party private investors. Construction financing will be procured on a non-recourse financing basis from banks and specialised infrastructure funds.
Q1.5.22	Applicant	**Whether Adequate Funding is Available** 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?	Adequate funding is likely to be available to the Applicant from shareholders, related parties and/or other UK based funders as they appear due. This is set out in the Funding Statement.
Q1.5.23	Applicant	**Whether Adequate Funding is Available** 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?	Further to the advice given by independent financial advisors, such as the EY London Energy & Infrastructure Corporate Finance team, the scheme should be able to achieve a sufficiently high internal rate of return to attract third party debt and equity investors, within the next two years.
Q1.5.24	Applicant	**Whether Adequate Funding is Available** 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. 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 Q1.14and reliability of this estimate?	The applicant has taken professional advice from leading land and consents advisory firms supporting major projects in the UK to estimate of the amounts necessary to cover the payment of compensation associated with the exercise of CA powers.

ExQ1	Question to	Question	Applicant's Response
Q1.5.25	Applicant	**Funding and Corporate Structure** 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?	The figure of £11 million been given to Solar Five Limited as a shareholder loan is as of December 2024 and does therefore not appear in the FY 2022 financial statements. Also, a loan does not appear as "substantive loss" on the balance sheet of financial statements.
Q1.5.26	Applicant	**Funding and Corporate Structure** 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. How does the Applicant explain this disparity and where is the significant investment due to come from?	Photovolt Development Partners GmbH is a German engineering company providing inter-company engineering support to SolarFive. Also, the company has on-lent funds received from its parent company Cransseta Investment Ltd to Solar Five. The source of such on-lent funds are not the equity base of Photovolt Development Partners GmbH.
Q1.5.27	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. 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?	980 MW have been developed in the following six projects in Japan:Ukujima Solar Farm with a total capacity of 480 MWOnikobe Solar Farm with a total capacity of 183 MWpKawasaki Solar Farm with a total capacity of 56 MWYamagata Solar Farm with a total capacity of 58 MWAkita Solar Farm with a total capacity of 40 MWGreen Academy Solar Farm with a total capacity of 40 MW The Applicant had raised the funds for the development, in some cases including construction finance and had enabled the acquisition by entities continuing and completing the construction and commissioning of the projects. Further to the advice given by independent financial advisors, such as the EY London Energy & Infrastructure Corporate Finance team, the scheme should be able to achieve a sufficiently high internal rate of return to attract third party debt and equity investors.
Q1.5.28	Applicant	**Funding and accounts**	Financial statements dated 31 December 2023 have been submitted and are publicly available (https://find-and-update.company-

ExQ1	Question to	Question	Applicant's Response
		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.	information.service.gov.uk/company/12602740/filing-history) Financial statements dated 31 December 2024 will be submitted in due course.
Q1.5.29	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.	Paragraph 7.6 of the Funding Statement [**APP-022**] reads: "The Applicant has also included a specific article (article 47 of the draft DCO [EN010147/APP/3.1]) which requires the Applicant to put in place financial security in respect of compensation liabilities, prior to exercising any of the relevant powers of compulsory acquisition (should they be granted)." Further to the Botley West Solar Farm Explanatory Memorandum January 2025(PINS Ref: EN010147 Document Ref: EN010147/APP/3.3 Rev 1), the following applies: "3.5.9 Article 23 (Private rights) is a model provision that (i) extinguishes private rights and restrictions over land so far as their continuance would be inconsistent with the exercise of the compulsory acquisition powers contained in Article 19 (Compulsory acquisition of land)" . Furthermore: 3.5.10 states that "Paragraph (4) provides that compensation is payable to any person who suffers loss as a result of the exercise of the powers in this Article and that such compensation would be payable under section 152 of the PA 2008 rather than the Compulsory Purchase Act 1965.". Accordingly, the Funding Statement [**APP-022**] should have referred to Article 23 Paragraph (4).
Q1.5.30	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. 1) Where is this company registered? 2) Provide the accounts for this business.	The company is registered with the Companies House (https://find-and-update.company-information.service.gov.uk/company/15009444). The Nature of business (SIC) 74901 is "Environmental consulting activities". The accounts for this business can be found at: https://find-and-update.company-information.service.gov.uk/company/15009444/filing-history
Q1.5.31	Applicant	**Other Matters** In the light of the CA Guidance, paragraph 19, please demonstrate: 1) How potential risks or impediments to implementation of the scheme have been properly managed.	1) The DCO powers being sought are intended to manage any potential risks or impediments to the delivery of the scheme as far as possible. For example, to the extent any potential interactions are anticipated with the apparatus of statutory undertakers, the protective provisions at Schedule 15 looks to set out an agreed framework that will govern those interactions to enable the Project to be implemented alongside the other infrastructure, apparatus and statutory undertakings. Furthermore, the Applicant recognises the uncertainty around the

ExQ1	Question to	Question	Applicant's Response
		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 the need to obtain any operational and other consents applicable to this type of development.	point of connection into a new National Grid substation. To manage that potential risk/impediment, the Applicant is seeking powers at Work No. 2 of Schedule 1 of the draft DCO to facilitate the delivery of that new substation under the DCO, if required. This is explained further at paragraph 1.4.7 of the Explanatory Memorandum [**REP1-006**]. 2) In the draft DCO, the Applicant is seeking powers for 'permitted preliminary works'. As explained in the Explanatory Memorandum, this concept is included to enable the undertaker to carry out certain enabling phase works and preparatory works prior to the submission of relevant details for approval under all of the requirements contained in Schedule 2 to the Order so that certain works can be carried out without "commencing" the authorised development, in order to build the required flexibility into how the authorised development can be constructed. The works identified in the "permitted preliminary works" include pre-commencement activities such as surveys, monitoring and site investigations which are considered appropriate as the nature of these works means they are not expected to give rise to environmental effects requiring mitigation. This enables such works to proceed without unnecessarily waiting for the discharge of all requirements. In relation to the need to obtain any operational and other consents, the position is set out in the Consents and Licenses Required Under Other Legislation [**APP-035**].
Q1.5.32	Applicant	**Other Matters** 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.	The Applicant has provided a response to ExA Q.1.7.26 on those other consents 'not started' - but there are no other changes to report.

ExQ1	Question to	Question	Applicant's Response
Q1.5.33	Applicant	**Neighbourhood Planning Act 2017** 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? As examples: 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?	1) At present the reforms to the temporary possession regime contained in the Neighbourhood Planning Act 2017 have not yet come into force. When this may happen is uncertain, as are the detailed implications of implementation for the authorised development. A DCO should achieve certainty, and it is therefore appropriate and necessary to disapply the reforms whilst taking account of their principles in the relevant articles of the Order, these being articles 29 and 30. Powers and controls on temporary possession powers are provided for at Part 5 of the draft DCO. These include overlapping provisions with the relevant sections of the Neighbourhood Planning Act 2017 which are not yet in force. This includes in respect of notice of entry for temporary possession. It is appropriate that the mechanisms for taking temporary possession of land are established and clear at the point of the DCO determination, hence it is appropriate to ensure that the DCO takes precedence over any future provisions which may come into force at some unspecified point in time under the 2017 Act. The inclusion of the notice provisions are to provide landowners with advanced notice of the exercise of temporary possession powers to manage any potential impact for that landowner. However, this needs to be balanced against the need for the undertaker to exercise temporary possession powers in order to facilitate the delivery of the Project. As a nationally significant infrastructure project, it is essential that there is no undue delay to the delivery of the Project and this risk would arise if a longer notice period was inserted. The need to facilitate access upon shorter notice is more pertinent during the construction phase when more frequent works are to be carried out during a shorter defined window, whereas it is more reasonable to provide a longer notice during the operational phase where works are less anticipated. Albeit, 28 days' notice, in light of the strong recent solar precedent (including the East Yorkshire Solar Farm Order 2025) is still considered reasonable and appropriate to ensure effective maintenance of a solar NSIP. 2) The Applicant does not consider such a requirement to be included in the DCO because the Articles include appropriate controls to ensure that the temporary possession powers are limited: • **Construction** – there is a need for flexibility during construction for the exercise of temporary possession powers and therefore it would not be appropriate or practicable to require the undertaker to state the period of possession in the notice. This is justified because, in any event, Article 29(4) limits the period over which an undertaker may take temporary possession for a maximum period of one year.

ExQ1	Question to	Question	Applicant's Response
			• **Maintenance** – Article 30(4) secures that "*The undertaker may only remain in possession of land under this article for so long as may be reasonably necessary to carry out the maintenance of the part of the authorised development for which possession of the land was taken*". This therefore provides sufficient flexibility for the undertaker to carry out necessary maintenance works whilst also ensuring that temporary possession is not any longer than is reasonably necessary. 3) No – this would unreasonably expose the Applicant to potential compensation liability far in excess of what is required to deliver the Project. A key benefit to temporary possession powers is that it enables the undertaker to refine the area of land over which compulsory acquisition powers may be exercised. For example, taking temporary possession of a wider cable corridor area to identify a narrower area most suitable for the cable laying, over which CA powers may be exercised. It would be impractical, illogical and unreasonable to enable a landowner to require compulsory acquisition of the full cable corridor area (at the scale of land sought for an NSIP). In fact, Articles 29(9) and 30(9) make it expressly clear that "*Where the undertaker takes possession of land under this article, the undertaker is not required to acquire the land or any interest in it*."
Statutory Undertakers			
Q1.5.34	Statutory Undertakers	**Acquisition of Statutory Undertakers' Land** 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.	

ExQ1	Question to	Question	Applicant's Response
Q1.5.35	Statutory Undertakers	**Planning Act 2008** Set out your position with regards to the tests under s127 and s138 of PA2008 as applicable to your respective interests.	
Q1.5.36	Applicant	**Thames Water Utilities Limited** Noting the content of the Thames Water Utilities (TWUL) DL1 submission, please confirm if an outline infrastructure drainage strategy has been submitted to TWUL.	No connection is proposed to Thames Water assets. Additionally, as stated in 7.6.1 - Outline Code of Construction Practice - Part 1 and Part 2 **[APP-232** and **APP-233],** pre-commencement surveys will be undertaken before construction on site to identify any local drainage assets and infrastructure. A Detailed CoCP will be provided as committed within the Outline CoCP. The CoCP will detail the requirements of pre-commencement surveys and best practice construction techniques to prevent damage to water supply and waste water drainage infrastructure.
Individual Affected Persons			
Q1.5.37	Applicant	**Roderick William Cameron Cooke and Christine Mary Cooke** 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.	The Affected Persons' land was originally included within the Land and Rights Tracker given the need to acquire rights over the Affected Parties Freehold title at Plot 6-17 [**APP-020**], however changes made during the Pre-Examination Process [**CR1-007**] noted as "Change 1" removed the Affected Parties freehold land interest from the Order Limits (as Plot 6-17 was removed from the Project) and therefore no agreement between the Applicant and the Affected Parties is required. Land remaining within the Order Limit of which the Affected Parties have rights, are between the Landowner for the Plots [6-19 and 8-07] and the Affected Parties (i.e. the Affected Parties are a tenant on land owned by the freeholder). The Applicant is therefore not required to enter into any agreement with the tenant/Affected Parties, therefore the green fill remains correct in the context of the Land and Rights Tracker. The Applicant has entered into voluntary agreements with the freeholder as appropriate. That Landowner may engage directly with the Affected Party to come to an agreement, but it is not for the Applicant to complete.
Q1.5.38	Applicant	**Siemens Healthcare Limited** 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.	The Applicant and the Applicants Land Agent have engaged with the Affected Party since October 2022, with further engagement and correspondence ongoing up to Examination (see Land and Rights Negotiation Tracker - [**REP1-008**], updated at Deadline 2). Virtual meetings have been held with the affected party on 25/07/2024 and 05/09/2024 to outline proposed mitigation measures to avoid the need for road closures, as well as reducing the Option Area over the gated area (email sent 29/10/2024), thus allowing the flow of traffic into the Affected Party's site, and to hopefully alleviate the concerns of the Affected Party. Mitigation

ExQ1	Question to	Question	Applicant's Response
			measures included traffic management plans, proposed works to be carried out of one side of the carriageway, meaning traffic can flow alongside the works, and a programme to complete the works during factory downtimes, or quieter hours. Technical drawings and methodologies were provided, including indicative timetables for the works. Follow up emails and requests have been made to the Affected Party's Agent for comment on these measures and the outline Easement Terms, between October 2024 and December 2024, as well requests on 15/01/2025, 07/04/2025 and 07/05/2025. No comments on the mitigation have been provided by the Affected Party or their Agent since being issued following the July 2024 meeting. Since the initial meetings to discuss routing of the cable in early 2024, the Applicant has identified a variation to the cable route to avoid tracking through the Affected Party's gated area, using Plot 11-27 and 11-28. Positive discussions have been held with the Landowner and the Agent for Plot 11-28 (Plot 11-27 is unregistered land), and its likely a voluntary agreement will be reached. This allows the Applicant to route the cable north of the Affected Party's land, meaning only c2m of their Freehold title will be directly affected. The Applicant has also submitted a Change Request 2 notification at this Deadline. One of those changes (Change 11) proposes to remove the land within the Affected Parties gated area along Wharf Road, to give some comfort that the area will not be used for the development, CA Powers cannot be acquired over it, and also that the Applicant is looking to work with the Affected Party to mitigate concerns and impact as much as possible. The discussions with the Landowner and Affected Party in relation to the remaining alternative route(s). It should be noted that the remainder of the cable route which runs through the Affected Party's title falls within Adopted Highway, and agreements are being made with the Local Authority Highway team to secure the relevant permits. The Applicant has reviewed alternatives in the area, such as running the cable in the verge, however this was not feasible due to the presence of a gas pipe. At the Affected Party's request, an alternative route through the allotment site to the north of Wharf Road was assessed, however was discounted due to the potential effects and displacement it would cause on the owners of the various allotment plots in the area. Another alternative cable route is being assessed via Cassington Road, however no agreements have been reached with the Landowner for that cable route either due to a lack of responses to emails and calls.

ExQ1	Question to	Question	Applicant's Response
Q1.5.39	All local authorities	**S131 and S132 of PA2008** 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.	

2.6 Q1.6 Cultural Heritage

ExQ1	Question to	Question	Applicant's Response
Cultural Heritage Errata			
Q1.6.1	Applicant	**ES Appendix 7.5 Settings Assessment [APP-142] errata** The ExA have noted some discrepancies within this document that require amending or an explanation if amendment is not needed. These are as follows: 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) The reference to Sansom's Platt in paragraph 1.9.17 in ES Appendix 7.5: Settings Assessment **[APP-142]** is correct. This part of the text set out locations where elements of the Project may be visible in views to and across the Hensington Scheduled Monument, specifically the higher ground to the west of Sansom's Platt. 2) This error has been corrected in the Revision 1 of this document submitted at Deadline 2. No changes to the assessment were required. 3) This error has been corrected in the Revision 1 of this document submitted at Deadline 2. No changes to the assessment were required.
Q1.6.2	Applicant	**Photomontages [APP-079] – errata** Viewpoint 42 shows panels to the southeast of Cassington, whereas the plans show that panels would be located to the northwest. Coupled with	The Applicant has reviewed the illustrative photomontage for Representative Viewpoint 42. There is no error within this view. Solar panels are located to the north, northeast and northwest of Cassington, with no solar panels to the southeast. The majority of solar panels are to the northwest of Cassington.

ExQ1	Question to	Question	Applicant's Response
		this, the existing and illustrative photomontages for both Year 1 and Year 15 are incorrect [APP-079, Viewpoint 42]. Re-issue with correct information and ensure that any individual asset assessments that rely on Viewpoint 42 are checked and amended as necessary.	With Cassington being low lying, it is not immediately obvious within the view. However, the church spire (St. Peters Church) at Cassington is visible above the treeline, beyond which the solar panels are illustrated. Further up the slope, views are available to Purwell Farm on the ridgeline to the northwest of Cassington. The majority of solar panels are illustrated to the northwest of Cassington as shown on Figure 2.1e in ES Figures 2.1a-2.4c - Illustrative Masterplan **[AS-020]** and other documents. It is also noted that there is a large area of seasonal flooding to the south of Cassington, clearly visible within Representative Viewpoint 42 (winter). The reflective nature of this flood water is such that it could be mistaken for solar arrays.
Q1.6.3	Applicant	**Change Request 1 - Outline Written Scheme of Investigation (OWSI) [CR1-005]** 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.	A Revision 2 of the Outline Written Scheme of Investigation has been submitted at Deadline 2. The figures now show the correct Order Limits and the archaeological protection areas.
Q1.6.4	Applicant	**Change Request 1** The key on the plan [CR1-007, Appendix A] is illegible. Please re-issue	A new legible version of the plan, and key, showing all of the proposed Areas of Archaeological Protection, including the two north of Burleigh Wood sought as part of Change Request 1, is provided as Appendix 1 to this document.
Q1.6.5	Applicant	**Gazetteers** There are several separate Historic Environment gazetteers and tables, for example: • [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.	These concordance tables will be submitted at Deadline 3.

ExQ1	Question to	Question	Applicant's Response
		• [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. The plans show BW numbers that require cross referencing to various other tables, which is time consuming and confusing. 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*. *If appropriate	
Above Ground Heritage Assets			
Q1.6.6	All Local Authorities	**Conservation Areas (CA)** 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. 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.	

ExQ1	Question to	Question	Applicant's Response
Q1.6.7	Applicant	**Group Value** 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. 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.	A Revision 1 version of the Settings Assessment was submitted at Deadline 2 [**EN010147/APP/6.5**]. This includes additional commentary regarding group value.
Q1.6.8	Applicant	**Conservation Grazing** 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?	The Applicant agrees that there are alternative ways to manage the land that would enable improvement in soil structure and soil quality. However, the assessment can only address the impacts and effects of the proposed development, not any alternative practices that may or may not be brought forward by the landowners and tenants. The improvements in soil structure and soil quality are seen as a heritage benefit in that they would increase the chance of the land being reused for arable farming following decommissioning, thus reversing any impact to the historic landscape caused by the Project.
Q1.6.9	Historic England ICOMOS	**Aerial Views** 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. Do you consider that such views should be taken into account in terms of assessment of the setting?	Although this question is aimed at Historic England and ICOMOS, the Applicant would like to comment on the issue raised by the Examining Authority with regard to the 'new rooftop tours' at Blenheim Palace. There are no 'rooftop tours' at Blenheim Palace. Currently visitors are offered access to an elevated fixed viewing platform that has been established as part of the works required for the restoration of the roof. The viewing platform is on the north-western side of the palace and provides a view along the principal design line over the Grand Bridge, past the Column of Victory and along the tree-lined avenue leading to the Ditchley Gate. The elevated viewing platform will be removed following the completion of the roof restoration works, currently programmed to end in May 2026. There is no intention to retain the elevated viewing platform beyond that date, or to introduce rooftop tours.

ExQ1	Question to	Question	Applicant's Response
Q1.6.10	ICOMOS	**Maps of proposed omissions** 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. 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.	
Q1.6.11	ICOMOS	**Extent of proposed omissions** 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). You state in paragraph 1 of section B of your submission that "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". 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.	
Q1.6.12	Applicant	**Response to ICOMOS Relevant Representation [RR-0413] and DL1 submission** Whilst the applicant responded to RR at DL1, the ExA are keen to explore the suggestions of	The Zone of Theoretical Visibility (ZTV) **[APP-082 to 084]** shows that there would be limited intervisibility between the solar panels and Blenheim Palace WHS. Site visits were carried out within the palace grounds and upper floor of the palace to address this specific issue. A field of panels was removed from the Project as it

ExQ1	Question to	Question	Applicant's Response
		ICOMOS as to the areas for excluding solar panels to better protect Blenheim's rural landscape that were submitted at DL1. 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.	was determined that it would have been partially visible, as indicated by the ZTV **[APP-082 to 084]**. Extensive existing vegetation within and outside the palace ground, along with topographical variation, prevent view to the Project from the Blenheim Palace WHS. The proposed solar farm has been carefully designed to ensure that no part of the development would be visible in any of the defined key views out of the Blenheim Palace WHS, or indeed from any location within the WHS. The design of the proposed solar farm also considered the visibility of the scheme when viewed by visitors approaching the Blenheim Palace World Heritage Site (WHS). Some fields directly adjacent to the approach routes were withdrawn from the scheme as a result. This is further described in the Applicant's assessment of likely impacts and effects in respect of the Blenheim Palace WHS which is presented in the Heritage Impact Assessment (ES Appendix 7.4 [**APP-141**]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (*Guidance and Toolkit for Impact Assessment in a World Heritage context*), and the preparation of the report was carried out within an iterative process in consultation with Historic England. The overall assessment of likely impacts and effects on the historic environment is presented within ES Chapter 7: Historic environment [**CR1-003**]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4, [**APP-141**]). The impact would be time-limited and fully reversible. The sensitivity/value of the WHS is determined as 'very high', resulting in a likely effect of 'minor adverse' significance, which is not significant in EIA terms. The Applicant also notes that ICOMOS-UK has made a Relevant Representation in respect of the scheme [**RR-0413**]. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the OUV of the UK World Heritage Sites and their settings is one of their key objectives.

ExQ1	Question to	Question	Applicant's Response
			ICOMOS-UK state that *'the proposed Botley West solar farm* ***would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map 'Character of Setting of WHS'*** on page 50 of Appendix III of the Management Plan'. (emphasis added)
Q1.6.13	Applicant	**Response to Historic England's DL1 Submission** 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. 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.	The Applicant has discussed this issue with Historic England as part of the ongoing consultation. It is now agreed that the fields identified by Historic England as being of concern will be removed from the developable area. This is reflected in Change Request 2 Notification, as submitted at Deadline 2. This change and other Change 2 notification involving the loss of further installation areas have been carefully assessed from an environmental, commercial viability, electrical and engineering perspective. All changes are acceptable to the Applicant.
Q1.6.14	ICOMOS Historic England West Oxfordshire District Council	**WHS Buffer zone** 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. 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?	
Q1.6.15	Applicant	**Blenheim Palace WHS – assessment of setting (1)** Paragraph 3.02 of the Blenheim Palace and Park World Heritage Site Management Plan 2017,	The design of the Project has sought to retain the green infrastructure through the retention and enhancement of the public rights of way network. This aspect of the likely socio-economic effects of the Project are set out in paragraphs 15.9.154 - 15.9.157 of ES Chapter 15: Socio economics **[APP-052]**,

ExQ1	Question to	Question	Applicant's Response
		Appendix III, Settings Study states: "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." Explain how this statement has been explored and assessed throughout the Heritage Impact Assessment (HIA) [APP-141].	which discuss the perceptions held by tourists in relation to renewable energy infrastructure. With regard to health, Chapter 16 **[APP-053]** discusses the effects associated with use of open spaces and public rights of way, including for local residents and surrounding villages. Additional detail is provided in Appendix 16.4 Human Health PRoW Analysis [**APP-222**]. Specific signposting to issues around health, mental health and access to open space and public rights of way, is set out in the Botley West Solar Farm Applicant Responses to Relevant Representations [**REP1-020**] (pdf page 74 of 545). These aspects will be further addressed in the next iteration of the Heritage Impact Assessment, which will also take account of the proposed changes to the Project design set out in Change Notification 2
Q1.6.16	Applicant	**Blenheim Palace WHS – assessment of setting (2)** 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. 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.	Paragraph 1.6.3 in the Applicant's Heritage Impact Assessment **[APP-141]** states that '*The Heritage Impact Assessment has found that the construction, operation and maintenance, and decommissioning of the proposed Botley West Solar Farm would result in a minor negative impact on one of the defined attributes which contribute towards the Outstanding Universal Value of the WHS. This impact arises from the visual change within the 'traditional English countryside' which forms the setting of the Blenheim Palace WHS*' (emphasis added). Hence the Applicant respectfully disagrees with the implication in the wording of this question that their assessment has found '*no harm to the setting*' of the WHS. The Applicant cannot see any text in the RR or DL1 submissions from Historic England in which this consultee claims that the impact on the setting of the WHS is 'greater than negligible', as set out in this question. In their RR, Historic England advise that they consider the impact on the Blenheim Park Grade I Registered Park and Garden would be 'greater than negligible' [RR-0398, page 8], but this assessment is not extended to the setting of the WHS. Historic England's detailed conclusions regarding the likely impact on the WHS are set out in paragraphs 5.39 - 5.58 of their Written Representation **[REP1-086]**. Paragraph 5.47 states '*In the language of the NPS (EN-1) the harm to the significance of Blenheim Palace and (the) RPG and the OUV of the WHS would be modest level of less than substantial harm* (sic)'. There is no text here which shows that Historic England consider the impact on the setting of the WHS to be 'greater than negligible'. In paragraph 8.2 of this Written Representation, Historic England state '*We consider, in relation to the Blenheim Palace World Heritage Site, Blenheim Palace and RPG, that the development would result in some harm to its*

ExQ1	Question to	Question	Applicant's Response
			OUV and significance'. Again, there is no text here which shows that Historic England consider the impact on the setting of the WHS to be 'greater than negligible'.
Q1.6.17	Applicant	**Response to Historic England DL1 Submission** 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.	Attribute 1 of the OUV of the Blenheim Palace WHS states '*It remains the home of the same aristocratic family, the successive Dukes of Marlborough, for whom it was built*'. The Applicant considers that the Project would not affect Attribute 1 in any way; the WHS would still remain the home of the successive Dukes of Marlborough. Attribute 4 of the OUV of the Blenheim Palace WHS states '*The surviving special relationship between the important architectural elements and their landscape setting are an exceptional piece of design and, together are greater than the sum of their parts*'. The Applicant considers that the Project would not affect Attribute 4 in any way; this attribute clearly addresses the relationship between the historic buildings within the WHS and the designed landscape within which they are set, hence the reference to this being '*an exceptional piece of design*'. The Project would not affect this important relationship between the historic buildings and the designed landscape. In paragraphs 5.44 and 5.45 of their Written Representation **[REP1-086]**, Historic England discuss the proposed works associated with the Project in the unreferenced field between Fields 2.25 and 2.8, and identify that the upper part of this field has some intervisibility with the WHS. The Applicant acknowledges this intervisibility and would refer to paragraphs 1.4.33-1.4.36 and Figure 1.6 in the Heritage Impact Assessment **[APP-141]**. This sets out how this particular field was removed from the Project during the design process in order to avoid any potential impact on the OUV of the WHS. The potential proposed works within this Field comprise the installation of the 275kV cable; this is indicated in Figure 2.2b in ES Figures 2.1a-2.4c - Illustrative Masterplan **[AS-020]**. None of the works associated with the construction of the cable corridor would be visible in views from within the WHS; it is the more elevated part of the field to the south of the potential cable corridor which has intervisibility with the WHS. Attribute 5 of the OUV of the Blenheim Palace WHS states '*The UK has by far the greatest concentration of veteran trees in northern Europe and within High Park, which sits in the south-west section of Blenheim Park, is one of the finest areas of ancient oak- dominated woodland in the country. It is partially descended from the ancient Wychwood Forest, a 12th century deer park and an Anglo- Saxon chase*'.

ExQ1	Question to	Question	Applicant's Response
			The Applicant considers that the Project would not affect Attribute 5 in any way; there would no impact on the ancient oak-dominated woodland within High Park. Attribute 7 of the Blenheim Palace WHS states *'The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim Palace and the traditional English countryside and villages surrounding it*'. The Applicant agrees that the Project has the potential to affect this defined attribute, although would point out that that no part of the Project would be visible in any views out of the WHS. The Applicant's assessment of the impacts and effects in respect of this attribute is set out in the Heritage Impact Assessment **[APP-141]**. The comments made by Historic England in their Written Representation **[REP1-086]** regarding the need for further details will be addressed in the next iteration of the Heritage Impact Assessment, including any updates resulting from the proposed changes to the Project design set out in Change Notification 2.
Q1.6.18	Applicant	**Church of St Peter and St Paul, Church Hanborough (Gd I)** It is acknowledged in [APP-142, paras 1.9.28 to 1.9.31] that views towards the Church would change. 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.	The Applicant's assessment of the likely impacts and effects on the Grade I listed Church of St Peter and St Paul at Church Hanborough is set out in paragraphs 1.9.27 - 1.9.31 of ES Appendix 7.5: Settings Assessment [**APP-142**]. This assessment refers to two photomontages from viewpoints looking towards the church, rather than just one as suggested by the text of this question. An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. This acknowledges that some views towards the church spire would be affected by the Project. However, the assessment also explains how the historical and evidential values of the church would not be affected, nor any aesthetic or communal values that are derived from the relationship of the church with the surrounding churchyard and the historic buildings within the settlement. The only impacts would arise from the visibility of the Project in longer views towards the church, or from those instances where the presence of the Project, including the proposed planting, affect current visibility of the church in longer views. The updated assessment also refers to the guidance set out the 2017 Historic England document *The Setting of Heritage Assets* which explains that, where church towers and spires are widely visible, impacts of proposed developments are more likely to be on their landscape values rather than their heritage values. The Applicant considers their assessment that the Project would

ExQ1	Question to	Question	Applicant's Response
			result in the heritage significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough being 'barely affected' is correct.
Q1.6.19	Applicant	**Church of St Peter, Cassington, (Gd I) (1)** 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.	The Applicant's assessment of the likely impacts and effects on the Grade I listed Church of St Peter at Cassington is set out in paragraphs 1.9.32 - 1.9.34 of ES Appendix 7.5: Settings Assessment **[APP-142]**. An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. The assessment explains how the historical and evidential values of the church would not be affected, nor any aesthetic or communal values that are derived from the relationship of the church with the surrounding churchyard and the historic buildings within the settlement. The only impacts would arise from the visibility of the Project in longer views towards the church, or from those instances where the presence of the Project, including the proposed planting, affect current visibility of the church in longer views. The updated assessment also refers to the guidance set out the 2017 Historic England document *The Setting of Heritage Assets* which explains that, where church towers and spires are widely visible, impacts of proposed developments are more likely to be on their landscape values rather than their heritage values. The Applicant considers their assessment that the Project would result in the heritage significance of the Grade I listed Church of St Peter at Cassington being 'barely affected' is correct.
Q1.6.20	Applicant	**Church of St Peter, Cassington, (Gd I) (2)** 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. Provide an additional photomontage from a more appropriate location and reassess the potential impact.	The Applicant refers to the response above to Q1.6.2.
Q1.6.21	Applicant	**Church of St Michael, Begbroke (Gd II*)** 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	The Applicant's assessment of the likely impacts and effects on the Grade II* listed Church of St Michael at Begbroke is set out in paragraphs 1.9.39 - 1.9.41 of ES Appendix 7.5: Settings Assessment **[APP-142]**.

ExQ1	Question to	Question	Applicant's Response
		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. 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.	There are views from within the Project site in which the tower of the Church of St Michael is visible along with the upper part of the Grade II listed St Philip's Priory. This is not an ecclesiastical building in the same way that the church is; it is a large house of initial mid 17th century date (known as Begbroke House) that was greatly enlarged in the 18th century before passing into the ownership of the Dukes of Marlborough. From 1897 to 2000 the house was used as a Servite priory and was renamed as St Philip's Priory. From 2012 the house has been used as an autism-specific school (LVS Oxford). An attached chapel was built in 1896 as part of the conversion of the house into a priory, this is separately listed at Grade II and is referenced on the listing as the Church of St Philip. It is now used as the main dining hall for the school. An updated and more detailed assessment of the likely impacts and effects on the Grade II* listed Church of St Michael at Begbroke is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. This includes reference to the visual association with the former priory (now school) and the attached chapel. The assessment also references visualisations that are presented in the Additional Photomontages for Historic Environment Assessment [**EN010147/APP/12.7**] submitted at Deadline 2. The assessment explains how the historical and evidential values of the church would not be affected, nor any aesthetic or communal values that are derived from the relationship of the church with the surrounding churchyard and the historic buildings within the settlement. The view towards the church from Spring Hill Road would similarly be unaffected. The Applicant considers their assessment that the Project would result in the heritage significance of the Grade I listed Church of St Michael at Begbroke being 'barely affected' is correct, notwithstanding any updates that may result from the proposed changes to the Project design set out in Change Notification 2.
Q1.6.22	Applicant	**Swinford Bridge (Gd II*)** 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:	1) Section 12.7 of ES Volume 1, Chapter 12 **[APP-049]** and Appendix 12.6 Construction Vehicle Trip Generation Assumptions **[APP-204]** set out the access strategy for construction vehicles. As part of this access strategy, construction HGVs will not travel across the B4044 Swinford Toll Bridge for any access purpose. This access strategy is set out as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and is secured at Schedule 13 of the draft Development Consent Order **[REP-004]**. Appendix 12.6 Construction Vehicle Trip Generation Assumptions **[APP-204]** shows that the only construction vehicles with the

ExQ1	Question to	Question	Applicant's Response
		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.	potential to cross the B4044 Swinford Bridge are construction staff movements via minibus. In such a situation there would be a peak of up to four minibus movements per day crossing the B4044 Swinford Bridge. The use of minibuses to transport construction staff (as opposed to staff driving by cars) is a measure within the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and is secured at Schedule 13 of the draft Development Consent Order **[REP-004]**. 2) Four minibus movements per day is a negligible number of vehicle movements in the context of existing vehicle movements across the B4044 Swinford Bridge; Appendix 12.3 Base Traffic Flows **[APP-201]** sets out that there are in the order of 10,000 vehicle movements across the B4044 Swinford Bridge per day, thus Four minibus movements per day equates to 0.04% of existing traffic flows and is deemed to be negligible in that context, and does not result in any requirements for any additional mitigation or repair with regards to the B4044 Swinford Bridge.
Q1.6.23	Applicant	**Hoardley House (Gd II*)** 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. 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.	The Applicant's assessment of the likely impacts and effects on the Grade II* listed Hordley House is set out in paragraphs 1.9.35 - 1.9.38 of ES Appendix 7.5: Settings Assessment [**APP-142**]. The design of the Project in this area has been carefully considered to rule out any intervisibility between the house and areas of solar PV panels and associated elements. There are views from a road to the south in which the upper part of the house is visible and in which two small areas of solar PV panels would also be visible, although there would be clear separation between the house and the solar PV panels. An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. This explains how the historical and evidential values of the house would not be affected, nor any aesthetic or communal values that are derived from the relationship of the house with the surrounding grounds of the property and the valley of the River Glyme to the west. Any impact would arise from the appearance of the panels and the house in the views from the south. The Applicant considers their assessment that the Project would result in the heritage significance of the Grade II* listed Hordley House being 'barely affected' is correct.
Q1.6.24	Historic England	**Swinford Bridge (Gd II*) and Hoardley House (Gd II*)** The ExA note that you have not included reference to Swinford Bridge or Hoardley House	

ExQ1	Question to	Question	Applicant's Response
		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.	
Q1.6.25	Applicant	**Shipton Slade Farm Group (Gd II)** 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]. 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. It would appear that the setting of this group could be severely impacted by the introduction of panels with only a limited buffer zone. 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.	The Applicant's assessment of the likely impacts and effects on the two Grade II listed buildings at Shipton Slade Farm is set out in paragraphs 1.9.51 - 1.9.54 of ES Appendix 7.5: Settings Assessment **[APP-142]**. 1) An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. This explains how the historical and evidential values of the former farmhouse and barn would not be affected, nor any aesthetic or communal values that are derived from their relationships with each other and with the other former farm buildings in this complex. There would be some change to the relationship with the land to the north and west that may once have been farmed from here, but that association has been eroded by the cessation of the use of the buildings for farming purposes and thus makes very little contribution to their heritage significance. The Applicant considers their assessment that the Project would result in the heritage significance of the Grade II listed buildings at Shipton Slade Farm being 'barely affected' is correct. 2) The proposed buffer zone is there to reduce impacts on residential amenity, as the buildings are now largely in use as residential properties. This includes the listed former barn as well as the former farmhouse. Neither of the listed buildings are located on the property boundary; in each case there are other buildings within the complex that are located between the listed building and the areas of proposed solar PV panels and association elements of the Project.
Q1.6.26	Applicant	**Burleigh Farmhouse (Gd II)** 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. No buffer zone is proposed to the east and with land	The Applicant's assessment of the likely impacts and effects on the Grade II listed Burleigh Farmhouse is set out in paragraphs 1.9.68 - 1.9.71 of ES Appendix 7.5: Settings Assessment **[APP-142]**. 1) An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. This explains that the setting of the farmhouse makes some contribution to its significance and that part of this

ExQ1	Question to	Question	Applicant's Response
		rising; this could have an impact on the setting and therefore significance of the heritage asset. 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.	contribution comes from the associative relationship with the surrounding farmland that is still farmed from here. 2) The Applicant considers their assessment that the Project would result in the heritage significance of the Grade II listed Burleigh Farmhouse being 'slightly harmed' is correct. The historical and evidential values of the farmhouse would not be affected, but there would be some harm to the aesthetic and communal values as a result of the changes within its setting, including the loss of the associative relationship between the farmhouse and the surrounding farmland. 3) The Applicant considers that the grounds on the eastern side of the farmhouse, along with Burleigh Road, provide an adequate buffer zone on this side of the listed building.
Q1.6.27	Applicant	**Mill Farmhouse Group (Gd II)** 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: 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.	The Applicant's assessment of the likely impacts and effects on the Grade II listed Mill Farmhouse is set out in paragraphs 1.9.72 - 1.9.76 of ES Appendix 7.5: Settings Assessment **[APP-142]**. 1) An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. This explains that although the listed building is named as Mill Farmhouse in the listing description, it is actually a millhouse with attached watermill. There is no cartographic evidence to support the suggestion that this was a farmhouse; the land here is currently farmed from Burleigh Farm. The setting of the former millhouse and associated watermill makes a reasonable contribution to its heritage significance, but this setting principally comprises the relationship with the River Evenlode and the leat which runs from the river and passes below the watermill. 2) The Applicant considers their assessment that the Project would result in the heritage significance of the Grade II listed Mill Farmhouse being 'slightly harmed' is correct. The historical and evidential values of the millhouse and attached mill would not be affected, nor would that principal setting which comprises the relationships with the River Evenlode and the leat. However, there would be some harm as a result of the changes within the wider setting including the longer views down the floodplain of the River Evenlode and up onto the higher ground around Purwell Farm.

ExQ1	Question to	Question	Applicant's Response
			3) The Applicant considers that the grounds on the southern side of the millhouse provide an adequate buffer zone on this side of the listed building. The assessment of likely impacts and effects may need to be revisited to account for the proposed changes to the Project design set out in Change Notification 2.
Q1.6.28	Applicant	**Dunbar Farmhouse (Gd II)** 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]. 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.	The Applicant's assessment of the likely impacts and effects on the Grade II listed Dunbar Farmhouse is set out in paragraphs 1.9.77 - 1.9.80 of ES Appendix 7.5: Settings Assessment **[APP-142]**. An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. This explains how the historical and evidential values of the former farmhouse would not be affected, nor any aesthetic or communal values that are derived from their relationships with the other former farm buildings in this complex. There would be some change to the relationship with the land to the east that may once have been farmed from here, but that association has been eroded by the cessation of the use of the building for farming purposes and thus makes very little contribution to its heritage significance. A buffer zone has been established to the south to avoid or reduce impacts on the heritage significance of the listed building. This buffer zone connects with the Church Hanborough Conservation Area which ensures that there would not be any development to the east of Dunbar Farmhouse as far as Lower Road. The Applicant considers their assessment that the Project would result in the heritage significance of the Grade II listed Dunbar Farmhouse being 'barely affected' is correct.
Q1.6.29	Applicant	**Upper Whitley Farmhouse (Gd II)** 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 Substation and the potential presence of the National Grid Substation within this has not been assessed.	The Applicant's assessment of the likely impacts and effects on the Grade II listed Upper Whitley Farmhouse is set out in paragraphs 1.9.98 - 1.9.100 of ES Appendix 7.5: Settings Assessment **[APP-142]**. 1) An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 **[EN010147/APP/6.5].** It is possible that some of the land within the Project Site was farmed from here, although if so this is no longer the case – it is all now farmed from Denmans' Farm. No element of the Project, including the project substation, would be visible in views to or from the listed building. Some elements of the Project would be visible in views from elevated land to the south in which the listed building is also visible. The historical and evidential values of the farmhouse would not be affected, nor would that principal setting which comprises the associated

ExQ1	Question to	Question	Applicant's Response
		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	farm buildings and the land to the south-east. The Applicant considers their assessment that the Project would no result in any change to the heritage significance of the Grade II listed Upper Whitley Farmhouse is correct. 2) The assessment includes consideration of the project substation and also the National Grid Substation in the event of this being located within the Order Limits. However, the assessment of likely impacts and effects may need to be revisited to account for the proposed changes to the Project design set out in Change Notification 2.
Q1.6.30	Applicant	**Bladon Conservation Area** 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.	The Applicant's assessment of the likely impacts and effects on the Bladon Conservation Area is set out in paragraphs 1.9.106 - 1.9.110 of ES Appendix 7.5: Settings Assessment **[APP-142]**. An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. The impact of the Project on the Conservation Area mostly arises from the visual appearance of solar PV panels and associated elements within several of the 'significant views' defined in the 1990 Conservation Area Character Appraisal. There would be no changes to the character and appearance of the Conservation Area, which provide much of its heritage significance. A buffer zone has been established which seeks to reduce the impact of the Project in these defined 'significant views', with new hedgerows to screen views of the solar PV panels and associated elements. Nonetheless the impact cannot be avoided entirely due to the proximity of the development, thereby resulting in slight harm to the heritage significance of the Conservation Area. Note however that the assessment of likely impacts and effects on this Conservation Area may need to be revisited to account for the proposed changes to the Project design set out in Change Notification 2.
Q1.6.31	Applicant	**Begbroke Conservation Area** 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	The Applicant's assessment of the likely impacts and effects on the Begbroke Conservation Area is set out in paragraphs 1.9.111 - 1.9.114 of ES Appendix 7.5: Settings Assessment **[APP-142]**. An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. As set out in the response to Q1.6.21 above, this includes reference to the visualisations that are presented in the Additional Photomontages for Historic Environment Assessment [**EN01047/APP/12.7**] submitted at Deadline

ExQ1	Question to	Question	Applicant's Response
			2. One of these visualisations clearly shows how the Project would be seen in views that currently include the tower of the Church of St Michael and also the northern end of the former Begbroke House which was subsequently used as a priory. The assessment explains how the Project would not be visible in any of the 'Positive Views' and 'Positive Vistas' that are identified in the 2008 Conservation Area Appraisal. There would be no changes to the character and appearance of the Conservation Area, which provides much of its heritage significance. However, it would be visible in views towards the Conservation Area in which important historic buildings within the Conservation Area are also visible. This results in some limited harm to the heritage significance of the Conservation Area. The Applicant considers their assessment that the Project would result in the heritage significance of the Begbroke Conservation Area being 'barely affected' is correct, Note however that the assessment of likely impacts and effects on this Conservation Area may need to be revisited to account for the proposed changes to the Project design set out in Change Notification 2.
Q1.6.32	Applicant	**Church Hanborough Conservation Area** 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. 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	The Applicant's assessment of the likely impacts and effects on the Church Hanborough Conservation Area is set out in paragraphs 1.9.115 - 1.9.118 of ES Appendix 7.5: Settings Assessment **[APP-142]**. An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. 1) The Applicant apologises for any confusion regarding the text of the final sentence of paragraph 117 in ES Appendix 7.5: Settings Assessment [**APP-142**]. This sentence tries to explain the only element of the historic settlement core that would be visible in views that include solar PV panels and associated Project elements such as PCSs would be the tall spire of the Church of St Peter and St Paul. The appearance of the church spire in these views provides an indication of the presence of a historic settlement, and the solar PV panels and associated Project elements would diminish this ability to perceive the likely presence of a historic settlement. In some views the mitigation provided for the Project in the form of new hedgerow planting would result in the loss of views of the church spire. However, there would be no changes to the character and appearance of this part of the Conservation Area, which provides much of its heritage significance.

ExQ1	Question to	Question	Applicant's Response
			2) Overall, the Applicant considers that the heritage significance of the Conservation Area would be slightly harmed, resulting in an impact of low magnitude.
Q1.6.33	Applicant	**Cassington Conservation Area [APP-142, paras 1.9.119 - 1.9.125]** 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. 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.	The Applicant's assessment of the likely impacts and effects on the Cassington Conservation Area is set out in paragraphs 1.9.119 - 1.9.125 of ES Appendix 7.5: Settings Assessment **[APP-142]**. The Applicant refers to the response above to ExQ1.6.2, which explains that the photomontage from Viewpoint 42 is correct. 1) An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 **[EN010147/APP/6.5].** This provides additional detail regarding the potential impact on the character of the village. 2) The updated assessment supports the Applicant's position that that the heritage significance of the Conservation Area would be slightly harmed, resulting in an impact of low magnitude.
Archaeology			
Q1.6.34	Applicant	**Assessment of non-designated archaeological sites.** In ES Chapter 7 [CR1-003] Table 7.5 refers in several places to "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" [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	As set out in ES Chapter 7: Historic Environment **[CR1-003]** and other documents, a total of 44 areas containing significant archaeological remains have been identified as being or regional or national importance and have been protected through the establishment of 'archaeological protection areas'. These have been removed from the developable land and will be retained as managed grassland within the Project Site. They will be fenced off during construction to ensure that no construction activities can take place within these areas, with appropriate signage placed on the fencing. Following the completion of construction the fences will be removed. 1) These 44 'archaeological protection areas' were identified principally through examination of the results of the geophysical survey as set out in ES Appendix 7.3: Geophysical Survey Report [**APP-133** – **APP-140**],

ExQ1	Question to	Question	Applicant's Response
		Order Limits therefore 54 sites in total. 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.	along with examination of the results of the review of aerial photographs and LiDAR data [**APP-132**] and the historic environment desk-based assessment [**APP-131**]. The geophysical survey data was tested through trial trenching and was found to be very accurate and reliable. Where potential archaeological remains were identified within the Project Site in the review of aerial photographs and LiDAR data **[APP-132]** but do not form one of the 44 'archaeological protection areas', this is because a) nothing was found at this location by the geophysical survey and subsequent trial trenching, or b) the potential remains were examined by the trial trenching and found to be of less than regional significance. 2) These concordance tables will be submitted at Deadline 3.
Q1.6.35	Applicant Oxford County Archaeology Service	**Buffer Zones around non-designated archaeological sites** ES Chapter 7 [CR1-003, Paragraph 7.9.7] refers to "appropriate buffer zones." Applicant - Explain what is "appropriate" and how this figure/measurement has been established for each asset? Oxford County Archaeology Service - are you in agreement with the identified areas of nondesignated archaeology and their respective buffer zones?	The buffer zones established around the areas containing significant archaeological remains in order to create the 'archaeological protection areas' were based on the review of the results of the geophysical survey as set out in ES Appendix 7.3: Geophysical Survey Report [**APP-133** – **APP-140**], following the testing of these results through the programme of trial trenching which found the geophysical survey data to be very accurate and reliable. No fixed measurement was used, it was simply a process of creating an 'archaeological protection area' for each location that fully enclosed the significant archaeological remains. Once the reports on the results of the programme of trial trenching are available, each of the 'archaeological protection areas' will be reviewed by the Applicant and the Lead Archaeologist at Oxfordshire County Council to ensure that the area is appropriate. If any adjustments to the 'archaeological protection areas' are considered necessary, these will be implemented within the detailed design layouts that have to be approved by the relevant planning authority. This is secured through Requirement 5a in Schedule 2 of the draft DCO **[REP1-004]**.
Q1.6.36	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.	
Q1.6.37	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)	

ExQ1	Question to	Question	Applicant's Response
		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?	
Q1.6.38	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.	The Applicant's assessment of the likely impacts and effects on the Scheduled Monument at Sansom's Platt is set out in paragraphs 1.9.4 - 1.9.14 of ES Appendix 7.5: Settings Assessment **[APP-142]**. An updated and more detailed assessment is presented within the Revision 1 version of the Settings Assessment that was submitted at Deadline 2 [**EN010147/APP/6.5**]. This provides additional detail regarding the potential impact on the heritage significance of the Scheduled Monument. Field surveys undertaken for the Project and also ahead of proposed tree planting in the vicinity, has established that evidence of activity associated with the Scheduled Monument extends beyond the designated areas in all directions. 'Archaeological protection areas' have been created within the design of the Project which seek to protect this evidence along with the setting of the Scheduled Monument. These are indicated on Figures 2.1b and 2.1c in ES Figures 2.1a-2.4c - Illustrative Masterplan **[AS-020]**. The Project would not affect the evidential value of the Scheduled Monument, which provides the greatest part of its heritage significance. However, elements of the Project would be visible in views from, towards and across the Scheduled Monument. This visibility would be greatest at the time of construction, reducing over time as new panting to screen the Project in such views reaches maturity. The Applicant considers that the heritage significance of the Scheduled Monument would be barely affected, with the magnitude of impact therefore being negligible adverse and the effect being minor adverse. The effect would be long-term (time-limited) and fully reversible.
Q1.6.39	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	The beneficial effect on buried archaeological remains from the cessation of ploughing would be experienced by all such archaeological remains regardless of their level of importance or value. There are 44 areas containing significant archaeological remains which have been identified as being or regional or national importance; these have all been protected through the establishment of 'archaeological protection areas' and would be retained as managed grassland within the Project Site. The beneficial effects of the cessation of ploughing would be experienced by all of these sites; quantities of

ExQ1	Question to	Question	Applicant's Response
		your assessment and reconsider the outcome/ conclusions reached in light of the additional evidence.	archaeological material were recorded on the surface and within the ploughsoil at several of these areas during the programme of trial trenching, indicating the ongoing damage caused by modern agricultural practices. The Applicant's assessment on likely impacts and effects in respect of buried archaeological remains of less than regional or national significance is set out in paragraphs 7.9.30 to 7.9.51 of ES Chapter 5: Historic environment **[CR-003]**. Paragraph 7.9.30 lists the construction activities that could result in harm to these buried archaeological remains. The list includes 'the installation of panels' - the piling referred to in Q1.6.39 is part of this activity, therefore it has been included within the impact assessment set out in this document and no further assessment is required.
Q1.6.40	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.	The detailed design of the 33kV cable network has not yet been undertaken, this will form part of the design work that is subject to approval by the relevant planning authority through Requirement 5a in Schedule 2 of the draft DCO **[REP1-004]**. However, one of the key factors in determining the final design of the 33 kV cable network would be the need to avoid the defined 'archaeological protection zones'. Consequently, it is considered very unlikely that any cables would be required to cross areas containing significant archaeological remains. Details for managing any unexpected areas of archaeological interest will be progressed through the Code of Construction Practice, in line with the outline Code of Construction Practice, as described at para 1.10.3 [**APP-232**].
Q1.6.41	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 placed on the surface of the ground, or the implementation of an appropriate programme of archaeological investigation ahead of construction. 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	1) Information regarding the nature of any appropriate programme of archaeological investigation is set out in Revision 2 of the Outline Written Scheme of Investigation that was submitted at Deadline 2 **[EN010147/APP/7.6.5].** 2) Surface-laid cables would be protected within ducting that would lie flat on the surface of the ground, in line with the outline Code of Construction Practice, as described at para 1.10.3 [**APP-232**].

ExQ1	Question to	Question	Applicant's Response
		would be protected, how this would impact on the ability to use the land for conservation grazing.	
Q1.6.42	Applicant	**Cable Route and accessible areas in areas of significant archaeology.** 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. The additional mitigation proposed suggests an appropriate programme of archaeological investigation prior to construction. 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) Further information on this process is set out in Revision 2 of the Outline Written Scheme of Investigation that was submitted at Deadline 2 [**EN010147/APP/7.6.5**]. 2) The implementation of the programme of further archaeological work described in the Outline Written scheme of Investigation is secured through Requirement 10 in Schedule 2 of the draft DCO **[REP1-004]**.
Q1.6.43	Applicant	**Cable Route and accessible areas in areas of less significant archaeology (1)** 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. 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	Further information on this process is set out in Revision 2 of the Outline Written Scheme of Investigation that was submitted at Deadline 2 **[EN010147/APP/7.6.5]**. The implementation of the programme of further archaeological work described in the Outline Written scheme of Investigation is secured through Requirement 10 in Schedule 2 of the draft DCO **[REP1-004]**.
Q1.6.44	Applicant	**Cable Route and accessible areas in areas of less significant archaeology (2)** ES Chapter 7 [CR-003] paragraph 7.9.35 notes that less significant archaeological remains could	Further information on this process is set out in Revision 2 of the Outline Written Scheme of Investigation that was submitted at Deadline 2 **[EN010147/APP/7.6.5]**.

ExQ1	Question to	Question	Applicant's Response
		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. The additional mitigation proposed is indicated in a provisional tense, suggesting alternatives, but also suggests investigation ahead of/ during construction. 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.	The implementation of the programme of further archaeological work described in the Outline Written scheme of Investigation is secured through Requirement 10 in Schedule 2 of the draft DCO **[REP1-004]**.
Q1.6.45	Applicant	**Archaeological Investigations** 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. 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.	1) The reports on the programme of archaeological trial trenching will be submitted at Deadline 5. 2) The Applicant acknowledges Historic England's position as set out in paragraphs 5.69 and 5.70 of their Written Representation **[REP1-086]**. The Applicant will supply a copy of the relevant report on the programme of archaeological trial trenching to Historic England as soon as it is ready, and will review their response at the earliest opportunity.

2.7 Q1.7 Draft Development Consent Order

ExQ1	Question to	Question	Applicant's Response
Interpretation and Articles			
Q1.7.1	The Applicant	**Ensuring correct terminology** 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	The Applicant has updated Article 12 so that it provides for the "*Permanent Stopping Up ~~Closure~~ of Public Rights of Way*". The use of 'closure' is correct in relation to the temporary provisions in Article 11, because the intention there is to temporarily 'stop' the use of the PRoW but the Applicant is not intending to affect the status of the highway. However, where Article 12 applies, the Applicant intends

ExQ1	Question to	Question	Applicant's Response
		closures and stopping up and reflect on whether what is actually intended would be delivered through the dDCO.	for those PRoW (as set out in Part 6 of Schedule 6) to cease to be a highway and therefore the Applicant agrees that 'stopping up' is the correct terminology for those permanent provisions. To be clear, those PRoW will be replaced/substituted by the new PRoW set out in column (d) of Part 6 of Schedule 6. The Applicant has submitted a notification for Change Request 2 alongside this Deadline 2 submission. This includes a proposed change for the refinement of Project layout and design to reposition the Public Rights of Way currently proposed to be stopped up and diverted, back to statutory alignment. This is anticipated to remove the need for the permanent stopping up powers. The Applicant will submit an updated version of the DCO as part of its formal Change Application.
Q1.7.2	Applicant	**Correct referencing** 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.	The Applicant would welcome further clarity on the amendment suggested here. The definitions of the various Acts in Article 2 of Part 1 of the draft DCO are listed in chronological order, starting with the earliest Acts and continuing to the most recent Acts. Therefore, the definition of the 1961 Act (the Land Compensation Act 1961, footnote (m)) intentionally comes before the definition of the 1965 Act (the Compulsory Purchase Act 1965, footnote (n)).
Q1.7.3	Applicant	**Definition of maintain** The definition of maintain includes the caveat of "but not remove, reconstruct or replace the whole of Work No.1 at the same time." 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?	1) This drafting reflects the reality that it's not possible to envisage precisely what maintenance activities will be needed across the 37.5-year operational period. Hence, the definition retains the necessary flexibility to "*inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of the authorised development...*". This power to "Maintain" is then controlled by: (a) the scope of the definition. For example, the power is not intended to facilitate a wholesale replacement of the entire solar installation area at once, hence the inclusion of the caveat referred to by the ExA in its question; and (b) the power itself at Article 5 (Power to maintain the authorised development). Article 5(3) confirms: "*This article does not authorise the carrying out of any works which are likely to give rise to any materially new or materially different effects that have not been assessed in the environmental statement*". This ensures that any exercise of the power will remain within the consented design envelope. This general scope of maintenance works is precedented in other solar DCOs including the recent West Burton Solar Project Order 2025 and the East Yorkshire Solar Farm Order 2025. The wording of the definition also directly aligns with the precedent set in the Mallard Pass Solar Farm Order 2024. The definition of "maintain" should also be read alongside the outline Operational Management Plan [**APP-234**]. This sets out that regular planned maintenance of the

ExQ1	Question to	Question	Applicant's Response
		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?	Project will be conducted to optimise efficiency of the Project infrastructure, such as replacement of PV modules and PCS, when required. Whilst the overall responsibility will be with the Applicant, the specific responsibilities will be confirmed in the Operational Management Plan to be submitted for LPA approval pursuant to Requirement 12 of Schedule 2 of the draft DCO. Therefore, any such activities will only have taken place once they have been subject to relevant planning authority approval. 2) The use of "Whole" is intended to be given its ordinary meaning and is referring to 'all of' or the 'entire' infrastructure covered by Work No. 1. 3) See the answer to 1) above. 4) Any large-scale infrastructure replacement within Work No.1 would be phased to avoid concentrated activity, so no dedicated construction compounds would be needed for storage, lay-down, or worker facilities. 5) On the basis that the replacement activities would occur over an extended period and avoid involve moving large volumes at once, existing roads will suffice. There is no need to re-lay haul roads. 6) Yes – to the extent the Code of Construction Practice (approved pursuant to Requirement 11) deals with any construction activities that are required for the purposes of replacement activities during the operational phase. However, the Applicant does not envisage the replacement activities to involve any construction activities that are substantial enough to fall within the measures set out in the CoCP. To give additional clarity on the nature of replacement activities that are proposed and the associated construction activities anticipated in relation to those, the Applicant has updated the outline Operational Management Plan at Deadline 2.
Q1.7.4	All local authorities Natural England Environment Agency Statutory Undertakers	**Disapplication of legislative provisions** 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).	
Q1.7.5	Applicant	**Street authority scope**	The Applicant has updated the draft DCO at Deadline 2 to amend Article 10 to address this concern. The updated drafting ensures that the maintenance

ExQ1	Question to	Question	Applicant's Response
	Local Highway Authority	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 no need to be maintained. Is that a reasonable interpretation?	obligation will apply to the undertaker even where it is the street authority, to ensure that the streets will be maintained by the undertaker in the event that the undertaker's status as a street authority does not otherwise carry with it such obligation. For context, as defined in Article 2 of the DCO, the references to 'street authority' has the same meaning as in Part 3 of the New Roads and Street Works Act 1991. At section 49(1) of the 1991 Act, 'street authority' means (a) if the street is a maintainable highway, the highway authority, and (b) if the street is not a maintainable highway, the street managers. The undertaker will only be a street authority if it is a street manager. At section 49(4) of the 1991 Act, 'street managers' means *"the authority, body or person liable to the public to maintain or repair the street or, if there is none, any authority, body or person having the management or control of the street"* (our emphasis). As such, the Applicant may be a street authority if it: (a) is liable to the public to maintain or repair the street; or (b) has management or control of the street. In the event of situation (b), the Applicant recognises that the undertaker's status as street authority would not necessarily require the undertaker to maintain the streets being altered. As such, on the basis that the old drafting would disapply the provisions of Article 10 which imposes a maintenance obligation, there would be no obligation to maintain that street. Therefore, the Applicant has amended Article 10(6) to only disapply the parts of Article 10 (see new paragraphs (2)(a) and (3)(a)) which would require the Applicant to seek approval from itself to its own satisfaction. This would be illogical and impractical. However, the new drafting ensures that the Applicant remains obligated to maintain the streets, even where it is a street authority. In the situation (a) above, the undertaker would be obliged to maintain the street as street manager and under the DCO. In situation (b) above, the undertaker would be obliged to maintain under the DCO (alongside its duty to manage and control the street as street manager). Finally, the Applicant has removed the proposed disapplication of Articles 10(4) and 10(5) because these provisions relate to a defence in the event of loss or failure arising from a failure to maintain. On the basis that the obligations to maintain will now apply under the DCO, these provisions are appropriate to apply.
Q1.7.6	Applicant	**Usage of Public Rights of Way (PRoW)**	1) These powers are required to enable access for construction, operation, and maintenance in areas with limited existing routes. We anticipate the use of light vehicles such as 4x4s or quad bikes to transport personnel, tools, and small

ExQ1	Question to	Question	Applicant's Response
	Local Highway Authority	Article 11(1)(b) authorises the Applicant to allow the use of public rights of way by motor vehicles. 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?	equipment. Use of PRoWs would be occasional and limited to what is necessary, for example, weekly access for inspections, monthly visits for vegetation management during the growing season, and a few times per year for equipment or panel replacement. In addition, access may be required in urgent cases, such as in the event of defects or accidents, as well as for daily inspections by fire safety personnel. See the streets, access and rights of way plans [**AS-004**] which illustrate what measures are proposed on which PRoW. 2) Parts 3 and 4 of Schedule 6 of the draft DCO provide a list of PRoW where the DCO powers authorising the use of motor vehicles on PRoW are intended to apply. For example, Article 11 (3)(c) refers to "*the public rights of way specified in column 2 of the table in Part 3 (temporary use of motor vehicles on public rights of way) of Schedule 6 (streets and public rights of way) to the extent specified in column 3 of that table*" and Article 11(3)(d) refers to "*the public rights of way specified in column 2 of the table in Part 4 (permanent use of motor vehicles on public rights of way) of Schedule 6 (streets and public rights of way) to the extent specified in column 3 of that table*". These are by reference to the streets, access and rights of way plans [**AS-004**]. 3) The Applicant has secured necessary commitments in the outline Code of Construction Practice [**APP-232**] in relation to the reinstatement of PRoW (see paragraphs 1.10.43 to 1.10.45). For example, "*Disturbance to PRoWs will be temporary where reasonably practicable and PRoWs will be reinstated as soon as reasonably practical*" (1.10.43) and "*PRoWs affected during construction of the Project will be reinstated following completion of the works to ensure that no permanent effects remain and to maintain the connectivity of the wider PRoW network*" (1.10.45). The Applicant is also committed to complying with a PRoW management strategy (as secured through sub-paragraph (b) of Requirement 11). The outline PRoW management strategy, as appended to the outline CoCP [**APP-232**], includes measures from paragraph 1.5.5 onwards regarding safety and crossings, and includes reinstatement provisions at paragraph 1.5.25. These commitments apply to the PRoW powers in general and therefore ensure that the measures relating to the use of motor vehicles on PRoW are suitably controlled.
Q1.7.7	Applicant Local Highway Authority	**Access to premises** Article 11(2) affords access for pedestrians to premises. 1) What about those with vehicles needing to access premises or houses?	Article 11(2) aligns with codes of practice issued by the Secretary of State for Transport pursuant to section 65 of the New Roads and Street Works Act 1991 (NRSWA) and section 174 of the Highways Act 1980, including the 'Safety at Street Works and Road Works' (2013) Code of Practice and the 'Traffic Signs

ExQ1	Question to	Question	Applicant's Response
		2) If vehicles are temporarily unable to access premises, how will this displacement be managed included any displaced parking in the area?	Manual' (2009, see Chapter 8, Part 1 (Traffic Safety Measures and Signs for Road Works and Temporary Situations)). The codes of practice require that pedestrian access to all properties and premises must be maintained at all times and Article 11(2) reflects that accordingly. The codes of practice set out that every effort should be made to maintain vehicular access to all properties and premises. The codes of practice are for making sure that all street works are safe for both operatives and the public, however, there may be occasions where it would not be safe to provide unrestricted vehicular access to premises. The codes of practice allow for road plates to be placed to bridge excavations for vehicular access. Due to the safety requirements for using road plates, their use must be planned in advance and so there may be occasions when those vehicles would need to park elsewhere and then access on foot. The management of periods when vehicular access may not be maintained would be undertaken as part of the requirements of the Oxfordshire Permit Scheme for Road Works and Street Works (2019), which Oxfordshire County Council operate under their duties as part of the Traffic Management Act 2004 and to which the Project will adhere. The Oxfordshire Permit Scheme is not disapplied or modified under the draft DCO and therefore the Applicant is committed to compliance with that Oxfordshire Permit Scheme. The Oxfordshire Permit Scheme requires details of the works, which includes any vehicular restrictions, to be discussed with other interested parties, including frontagers, and be modified, as requested, where it is appropriate and practicable. That will be undertaken prior to the works commencing and post consent after a contractor has been appointed. The management of vehicular access to premises and all matters arising from any temporary periods where access cannot be safely maintained will be undertaken as part of the Oxfordshire Permit Scheme to which the Project will adhere.
Q1.7.8	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.	Yes – that's right. The Applicant has a general power to make temporary traffic provision(s) for the purposes of the authorised development which is not limited to the Order limits. This general power is justified on the basis that Article 16(2) is "*subject to the provisions of this article…*" and is therefore controlled by the other aspects of Article 16. Most notably, Article 16(4) ensures that "*Before exercising the power conferred by paragraph (2) the undertaker must… obtain the written consent of the*

ExQ1	Question to	Question	Applicant's Response
			traffic authority." Therefore, any ability of the Applicant to exercise its general power will be subject to the traffic authority first giving its consent. As such, the general power cannot be exercised by the Applicant in its sole discretion and is suitably limited. There are also additional controls in Article 10(5) in relation to giving notice to relevant authorities and local people. This drafting has strong precedent in made solar DCOs, including The Mallard Pass Solar Farm Order 2024, The West Burton Solar Project Order 2025 and The East Yorkshire Solar Farm Order 2025.
Q1.7.9	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?	The carrying out of the authorised development is subject to the Requirements at Schedule 2 of the draft DCO. Requirement 6 secures the need for a Landscape and Ecology Management Plan (LEMP) to be submitted for approval, which must be substantially in accordance with the outline LEMP. The Applicant has updated the oLEMP at Deadline 2 to include an obligation to require replacement where required by the street authority. Namely: "*where an individual tree subject to a TPO must be removed to facilitate part of the scheme and the local authority requires replacement, a new tree of equivalent species and ultimate size will be agreed with the LPA. Planted in the same place or as near as reasonably practicable to the position of the removed tree, subject to operational requirements. Replacement planting for individual trees will utilise Standard tree stock (8- 10cm girth) and will be planted in the next planting season following removal. The final species and planting location will be agreed in advance with the LPA".* The power to fell trees subject to tree preservation orders has strong precedent in made solar DCOs, including The Gate Burton Energy Park Order 2024, The West Burton Solar Project Order 2025 and The East Yorkshire Solar Farm Order 2025. To confirm, each of those precedents also includes the wording at Article 39(2)(b) that "*the duty contained in section 206(1) (replacement of trees) of the 1990 Act does not apply*".
Q1.7.10	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.	The reference to the Transport and Works Acts Orders is because the draft article is not a model DCO provision. As set out in the Explanatory Memorandum, the wording is based on article 44 of the model clauses for railway contained in schedule 1 to the Transport and Works (Model Clauses for Railways and Tramways) Order 2006. However, this wording has strong precedent in many made DCOs that have been granted under the Planning Act 2008 regime including recent solar DCOs such as the Gate Burton Energy Park Order 2024, the West Burton Solar Project Order 2025 and the East Yorkshire Solar Farm Order 2025.

ExQ1	Question to	Question	Applicant's Response
Q1.7.11	Applicant	**Community educational facility** 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.	The facility has been included in the original project, as set out in Chapter 16 of the Environmental Statement [**APP-053**] and the outline Operational Management Plan [**APP-234**]. As set out in those documents, further details (including the location, size and scale of the facility) will be finalised during the detailed design phase and included within the detailed Operational Management Plan (as secured under Requirement 12 of the draft DCO). The Applicant has also submitted a notification of Change Request 2 alongside this Deadline 2 submission. This notifies the ExA of the intention to expressly include reference to the community educational facility in 'Chapter 6: Project Description' to remove any doubt as to whether the facility forms part of the proposed development. In due course, as part of the formal Change Application, the Applicant will update Work No. 6 of Schedule 1 of the draft DCO to make it clear that the works packages include powers for "*amenity and education facilities*", to facilitate the community educational facility.
Q1.7.12	Applicant	**Article 22** 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 Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land published by DCLG (now MHCLG).	The advantage of the drafting of Article 22 is that it would allow the compulsory acquisition of new rights over Order land which is shown pink on the Land Plans [**AS-006**] as being subject to compulsory acquisition of the freehold; whilst the Applicant considers that freehold acquisition is required to be sought over the land shown pink, if ultimately a lesser interest could be taken, Article 22 does not preclude that. This aligns with the 'Planning Act 2008: Guidance related to procedures for the compulsory acquisition' in that it seeks to secure flexibility that balances the public interest (i.e. the need to secure the necessary compulsory acquisition powers to facilitate the delivery of a Critical National Priority project) against private loss (i.e. by allowing a lesser interest to be acquired where the full freehold title does not ultimately need to be acquired). This approach has precedent in made Orders, for example The Cottam Solar Project Order 2024 (articles 22 and 29) and The West Burton Solar Project Order 2025 (articles 22 and 29). Further explanation for the power is included in the Explanatory Memorandum [**REP1-006**] which has been updated at this Deadline 2. To confirm, Article 22 does not operate to allow the compulsory acquisition of new rights of all land within the Order Limits; the power cannot be utilised over land where only temporary possession is sought, but it can be utilised over land where new rights only are sought and where compulsory acquisition of land is sought. Article 22(1) is drafted to make clear that Article 22 is subject to article 29 (temporary use of land for constructing the authorised development).

ExQ1	Question to	Question	Applicant's Response
			Article 29(1) authorises the undertaker to take temporary possession of the land included in Schedule 11 (article 29(1)(a)(i)), as well as any Order land. Article 29(10) then confirms that "*The undertaker must not compulsorily acquire, acquire new rights over or impose restrictive covenants over, the land referred to in paragraph (1)(a)(i) under this Order*" (that is, the land included in Schedule 11 over which only temporary possession is sought). New rights pursuant to Article 22 can therefore not be acquired over land identified in Schedule 11.
Q1.7.13	Applicant	**Article 24** 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?	The Applicant has updated the Explanatory Memorandum at Deadline 2 to refer to The West Burton Solar Project Order 2025 and The East Yorkshire Solar Farm Order 2025, which set precedent for the wording sought by the Applicant. Similar wording is also found in The Heckington Fen Solar Park Order 2025.
Q1.7.14	Applicant	**Article 29** 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". 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.	The Applicant would welcome further clarity on the amendment suggested here please as we are not clear on the concern. The wording at Article 29(1) is "*in connection with the construction of the authorised development*" because Article 29 relates to temporary use powers during construction. The use of 'carrying on' may imply an intention to apply to operation, which is dealt with separately through Article 30 (Temporary use of land for maintaining the authorised development). The provisions of sub-paragraphs (a) to (f) then assist by setting out more precisely the scope of the powers under Article 29(1) over the land to be temporarily used for the construction of the authorised development. Article 29(1)(a) identifies specifically what this land is, with sub-paragraphs (b) and (e) then referring back to 'that land'. The Applicant would also welcome further clarity here on what is meant by 'undefined new rights', noting Article 29 relates to powers of temporary possession.
Q1.7.15	Applicant	**Articles 29 and 30** 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 powers over the Order land are considered necessary and appropriate as they allow the Applicant to minimise the extent of compulsory acquisition of land and rights. This is explained in the Applicant's Statement of Reasons [**AS-015**] at paragraph 5.8.

ExQ1	Question to	Question	Applicant's Response
		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. 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.	In short, temporary possession powers allow the Applicant to enter on to land for particular purposes in advance of any vesting of the relevant land/rights, which enables the Applicant to only compulsorily acquire the minimum amount of land and rights over land required to operate and maintain the Project. For example, this would facilitate the Applicant initially taking temporary possession of a wider area for the Cable Corridor, and then once the Applicant has carried out detailed surveys and installed the cables, the Applicant can then acquire new rights (pursuant to Article 22) within only a narrower strip in which permanent rights are required, within the wider Cable Corridor. This phased approach to occupation and acquisition allows the permanent rights corridor to be defined after construction, and to be only that which is necessary for the operation, maintenance and protection of the apparatus. Without these temporary possession powers, the Applicant would need to acquire permanent rights over a larger area in order to construct the Project, when ultimately it may only need rights over a narrower or smaller area once operational. Such an approach has precedent amongst other DCOs including the Longfield Solar Farm Order 2023, Gate Burton Energy Park Order 2024, and the Cottam Solar Project Order 2024. In terms of steps taken to alert people of the possibility of taking temporary possession, when engaging with landowners to secure voluntary agreements, the landowners have been made aware of this both verbally and in various emails, and the voluntary agreements (where secured) allow for the temporary possession of their land for the reasons explained above.
Requirements			
Q1.7.16	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.	In terms of scope, amendments will only be permissible to the 'Approved Documents, Plans, Details or Schemes' if they fall within the scope of the existing environmental impact assessment. See sub-paragraph (2), which expressly provides that approval for amendments "*must not be given except where it has been demonstrated to the satisfaction of the relevant planning authority that the subject matter of the approval sought is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the environmental statement*." This is appropriate as it allows for minor amendments to the control documents in the future, within the strict parameters of requiring relevant planning authority approval and being within the effects already identified by the environmental statement.

ExQ1	Question to	Question	Applicant's Response
			Amendments to the "Approved Documents, Plans, Details or Schemes" under Requirement 3 relates to amendments to 'any plans, details or schemes which have been approved pursuant to any requirement'. The approving body for the purposes of approving plans, details or schemes under the requirements is the relevant planning authority. For example, see Requirement 6(1) (Landscape and Ecology Management Plan which provides that "*No part of the authorised development may commence until a written landscape and ecology management plan has been submitted to and approved by the relevant planning authority for that part, or where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*" (our emphasis). As the relevant planning authority (or authorities) is the relevant body that approves any plans, details or schemes pursuant to the requirements, it is appropriate for that relevant planning authority (or authorities) to be the approving authority for any amendments to those plans, to ensure a consistent approach in the approval process. Further, the draft DCO includes a procedure for the discharge of requirements (Schedule 16). Therefore, in granting the DCO, the Secretary of State will have had involvement in ensuring a robust approval process.
Q1.7.17	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?	The Applicant does not consider it necessary for the Requirement to be extended to cover the operational period on the basis that there will not be frequent enough activity to justify the need for any such requirement. The outline Operational Management Plan (OMP) (as secured under Requirement 12) is the more appropriate securing document here. This outline plan confirms that the final OMP will set out all roles, responsibilities and actions required in respect of implementation of communication methods. The purpose behind the existing requirement is to ensure that where (more frequent) activity is occurring during the shorter construction phase of the Project, representatives of people living in the vicinity will have a clear route of liaison with other relevant organisations to understand the works being carried out. This is not considered necessary or appropriate during operation where the frequency of visits will be minimal. The comparable requirements for a community liaison group in The Gate Burton Energy Park Order 2024, The West Burton Solar Project Order 2025 and The East Yorkshire Solar Farm Order 2025 are all limited to the construction period only.
Q1.7.18	Applicant	**Requirement 5**	The general approach to the drafting of the requirements is to secure the need for the undertaker to submit a management plan for approval, with that management

ExQ1	Question to	Question	Applicant's Response
		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?	plan to be 'substantially in accordance with' the outline details provided in the outline plan. This approach is appropriate where enough details are known at this stage to ensure that the outline plan can contain sufficient information to remove the need for the requirement itself to stipulate what other details must be included in the final plan. Flexibility is then allowed for in the Requirement itself through the use of 'substantially' in accordance with, in case the provisions of the outline plans need to evolve slightly nearer to detailed design. However, for the purposes of Requirement 5, design details will not be known or available until the detailed design stage. Therefore, the Applicant cannot seek to capture all design details (even in outline form) with certainty at this stage. As such, Requirement 5(1) sets out what the final design details must include (for example, layout, scale etc.) when submitted for approval. The intention behind the Outline Layout and Design Principles [**REP1-014**] (OL&DPs) is to set out the 'principles' or maximum parameters in relation to key infrastructure that the final design must accord with, to guide the final design details being submitted under Requirement 5(1). Notably, Requirement 5(2) requires that the details to be submitted "must accord with" the OL&DPs. This contains less flexibility than the language for other requirements to ensure that stronger reliance can be placed on the parameters secured in the OL&DPs. This is necessary because the OL&DPs inherently contain some flexibility (being parameters), therefore the obligation under the Requirement is to accord with those parameters to give clear certainty that the design must fall within those parameters. In comparison, the detail in the other management plans is greater than the OL&DPs, hence the additional flexibility being appropriate in the drafting of those Requirements. The Applicant therefore maintains that its current drafting is appropriate. There is strong precedent for this approach in other made DCOs, including the West Burton Solar Project Order 2025 (see 'concept design parameters and principles'); the Heckington Fen Solar Park Order 2025 (see 'outline design principles'); and the East Yorkshire Solar Farm Order 2025 (see 'outline design principles statement').
Q1.7.19	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?	The mitigation strategy for buried archaeological remains has been agreed with the Lead Archaeologist at Oxfordshire County Council. This mitigation strategy is captured in the Outline Written Scheme of Investigation which is secured through Requirement 10. An updated version of the Outline Written Scheme of Investigation [**EN010147/APP/7.6.5**] has been submitted at Deadline 2. The mitigation strategy ensures that all areas containing significant archaeological remains are excluded from the development and retained as managed grassland. It also establishes the processes that will be followed with regard to areas of

ExQ1	Question to	Question	Applicant's Response
			impact over and above the installation of panels. Such areas include temporary construction compounds, entry and exit pits for trenchless crossings, and the cable routes where these are outside the three main sites. The outline written scheme of investigation therefore covers everything that can be covered at this stage. As the archaeological written scheme of investigation to be submitted in accordance with Requirement 10 must be substantially in accordance with the Outline Written Scheme of Investigation, there is no need for an additional requirement because all of the appropriate details are already secured.
Q1.7.20	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?	The Applicant considers that the relevant planning authority is the appropriate discharging body. As the Applicant is not proposing any works within the National Highways network, the Applicant does not consider it to be appropriate or necessary for National Highways to be added as a consultative body.
Q1.7.21	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.	There is one reference to 'fibre optic cables' in the draft DCO at paragraph (a)(vi) of Work No. 4 in Schedule 1, in relation to the works package for the high voltage electrical cabling. There are also two references to 'optical fibre cables' (at paragraph (a) of the definition of "electrical cables" in Article 2 and at paragraph (a) of the definition of "cable rights" in Schedule 9). The Applicant has updated the draft DCO to amend the reference at Work No. 4 to 'optical fibre cables' to ensure consistent terminology throughout. There is one reference to 'telecommunications cables' in the draft DCO at paragraph (a) of the definition of "cable rights" in Schedule 9. This is listed in addition to 'optical fibre cables' because the 'cable rights' definition needs to capture all forms of cabling that may be required in exercising the cable rights (including telecommunications cables, which is broader than optical fibre cables as it would also include copper cables, for example).
Q1.7.22	Applicant Statutory Undertakers	**Protective Provisions** Please review the protective provisions contained in the dDCO. 1) Advise whether there is written agreement or disagreement on the protective provisions as drafted.	1) The position in relation to negotiations with each party who has requested bespoke protective provisions to date is summarised below, with the references in brackets being to the relevant Part of Schedule 15 (Protective Provisions): • **Network Rail (Part 4)** – The protective provisions have been agreed save for the inclusion of wording that would affect the Applicant's use of compulsory acquisition powers. A framework agreement is being negotiated between the parties to resolve this. • **Thames Water (Part 5)** – The protective provisions are almost agreed, save for some minor outstanding queries between the parties. For

ExQ1	Question to	Question	Applicant's Response
		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.	example, in relation to the scope of the indemnity wording. Further, similarly to the position with Network Rail, the Applicant cannot agree to the inclusion of the proposed wording that would affect the Applicant's use of compulsory acquisition powers. Discussions in relation to a voluntary property agreement are ongoing to resolve this. • **Southern Gas Network (Part 6)** – The protective provisions have been agreed. The Applicant is liaising with SGN to arrange execution of an accompanying side agreement. The protective provisions in the draft DCO will be updated to reflect that agreed position in due course. • **Environment Agency (Part 7)** – The protective provisions are not yet agreed but the Applicant does not consider there to be any particular areas of dispute that cannot be resolved prior to the end of the Examination. The Applicant is awaiting a response from the Environment Agency having shared its latest comments on 4 April 2025. The Environment Agency has suggested that a response is anticipated week commencing 14th July. • **NGET (new Part 8 and Part 9)** – The Applicant is liaising with NGET in relation to two sets of protective provisions: (1) existing apparatus; and (2) future apparatus. The protective provisions are not yet agreed but the Applicant does not anticipate there to be any particular areas of dispute that cannot be resolved prior to the end of the Examination. The Applicant is awaiting a response from NGET on the first set of protective provisions having shared a first draft on 13 March 2025 and having chased since. The Applicant is also preparing the second set of PPs to share to NGET for comment. The Applicant will continue to liaise with NGET to reach an agreed position on both sets of provisions. 2) See above. 3) No response required from the Applicant.
Q1.7.23	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.	Auxiliary Equipment (as defined in paragraph 1 of Schedule 1) forms part of the associated development. It is required as part of Work No. 3 (development of onsite Substations and associated works). The reference to Auxiliary Equipment at Work No. 3(a)(i) confirm that it is a necessary component of the Main Substation works package, whilst the reference to Auxiliary Equipment at Work No. 3(b)(i) confirms that it is a necessary component of each of the six secondary substations.

ExQ1	Question to	Question	Applicant's Response
Q1.7.24	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	The scope of the works comprising the New National Grid substation is defined in paragraph 1 (Interpretation) of Schedule 1 of the draft DCO. This confirms that the New National Grid substation "*means a compound containing electrical equipment (including power transformers, gantries, switchgear, reactive compensation equipment, electrical protection equipment devices (disconnectors, circuit breakers), harmonic filters, cables and back-up generators), control buildings, lightning protection masts, communications masts, access, fencing and other associated equipment, structures or buildings*". This wording has been issued to and confirmed by National Grid.
Controlling Documents for the dDCO			
Q1.7.25	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.	The latest versions of the documents as referred to by the ExA's question are summarised below: • Guide to the Application [**REP1-002**] – paragraph 2.1.9 refers to a footprint of approximately 87m by 30m, with a maximum main building height of 12m, but this is now outdated; • Statement of Statutory Nuisance [**PDB-004**] – paragraph 1.4.10 refers to the same parameters as the Guide to the Application but this is now outdated; • Explanatory Memorandum [**REP1-006**] – paragraph 1.3.6 refers to the same parameters as the Guide to the Application and the Statement of Statutory Nuisance but this is now outdated; and • Outline Layout & Design Principles [**REP1-014**] – this refers to a footprint of 76m x 31m with a 14m height of main building. The Applicant has updated the Guide to the Application, Statement of Statutory Nuisance and Explanatory Memorandum to align with the position in the Outline Layout & Design Principles. However, please note the Change Request 2 notification that the Applicant has submitted alongside this Deadline 2 submission. This notifies the intention for a proposed change to these parameters to reflect the latest design from National Grid. Updated versions of all documents will be submitted as part of the formal Change Application.

ExQ1	Question to	Question	Applicant's Response
Q1.7.26	Applicant	**Other Consents and Licences** 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?	In terms of Consents and Licenses noted in the document [**APP-035**] noted at the submission stage as 'not started', the Applicant responds as follows; **HIGHWAYS** A permit for the transport of Abnormal Indivisible Loads (AIL) will be progressed by an appointed heavy haulage contractor; this will be in advance of the movement of the AIL and post consent after their appointment. Notice of Street Works will be progressed by the relevant contractor(s) via the Oxfordshire Permit Scheme for Road Works and Street Works (2019); this will be in advance of street works commencing and post consent after their appointment. Section 278 Agreements will be progressed via the Highways Act (1980); this will be following the undertaking of detailed designs and the granting of Technical Approval by Oxfordshire Council and will be post consent. **WATER** The need for a permit in regard to Water Discharge Activity will depend on the requirements of the relevant contractor(s), and will be undertaken in liaison with the Environment Agency, also at the post consent stage. **NOISE** At this stage, a Section 61 application is not required. Only once exact construction details, and timings have been confirmed will an application to the Local Planning Authority be made.
Q1.7.27	All local authorities Natural England Environment Agency Historic England Statutory Undertakers	**Management Plans** A number of management plans are submitted with the application. 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	

ExQ1	Question to	Question	Applicant's Response
		Construction Practice) that you consider are important or critical to be reviewed during the Examination, and thus the Applicant should submit now?	
Q1.7.28	Applicant	**Side agreements and legal agreements** 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.	The Applicant has agreed a form of 'side agreement' with Southern Gas Networks Plc (SGN). The parties are liaising to arrange execution of that private side agreement. This agreement looks to secure confidential commercial provisions to facilitate the agreement of the protective provisions to be included on the face of the Order. The Applicant is also discussing a 'framework agreement' with Network Rail Infrastructure Limited. Similarly to SGN, this framework agreement will facilitate the agreement of the protective provisions. There are no other side agreements currently being discussed or negotiated, including no agreements pursuant to section 106 of the Town and Country Planning Act 1990.

2.8 Q1.8 Ecology and Biodiversity

ExQ1	Question to	Question	Applicant's Response
Ecological interests			
Q1.8.1	Applicant	**Clearer plans required** 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.	The Applicant has submitted a supplementary set of plans (Additional Hedgerow Removal Detailed Plans [**EN010147/APP/12.8**]), which show the proposed areas of hedgerow removal at the requested scale (1:500) and using a different background map. These new plans are more zoomed in to clearly highlight the hedgerow to be removed and the length. These should be read alongside the previous Hedgerow Removal Plans Rev 1 [**AS-007**] which identify where these hedgerows are located in relation to the Order limits.
Q1.8.2	Applicant	**Compounds in the Environmental Statement** 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	The location of the proposed construction compounds and layouts is shown on the Site Compounds and Elevations document **[APP-230]**. The presence of the compounds within the construction of the Project is identified within Table 9.4.1 of ES Chapter 9 **[PDB-008]**. This sets out that the key impacts that could arise from the use of the compounds on both habitats (habitat loss, habitat disturbance (eg

ExQ1	Question to	Question	Applicant's Response
		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.	dust, light, noise pollution/introduction of toxic pollutants), introduction or spread of invasive species (in particular along the water courses within the Project site and surrounding land), changes to air/water quality/flow), and species (direct killing or injuring of fauna, disturbance and displacement of species (particularly to those sensitive to noise and light disturbance), introduction or spread of invasive species). The effects of such impacts on the various ecological receptors are then considered within section 9 of ES Chapter 9 (e.g. section 9.9.531 *et seq*.) describes the potential impact from pollution events that could be released from compounds and then identifies measures set out in the oCoCP **[APP-232]** to mitigate such effects on receptors. As set out in section 1.9 of the oCoCP **[APP-232],** the location of all compounds has been chosen to minimise potential adverse environmental impacts. For example, they are all within existing arable fields and will be located a minimum distance away from any hedgerow, woodland or watercourse/body, i.e. following the implantation of the necessary buffers set out in section 1.10.5 *et seq*. of the oCoCP **[APP-232]**.
Q1.8.3	Applicant	**Substations in the Environmental Statement** 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.	As set out in Table 9.7.1 of ES Chapter 9 **[PDB-008],** the presence of the substations (NGET, main project and smaller substations) and power converters was part of the Maximum Design Scenario assessed. Where relevant, this was clarified in the revised ES Chapter 9 submitted at Procedural Deadline B **[PDB-008]**. Since the assessment of effects is required at a Project level, rather than at the level of individual components of the Project, the substations and power converters are only mentioned where they are relevant to the impact/effect. However, for the avoidance of doubt, the following is a summary of the ecological effects as they relate to the electrical infrastructure (substations and power converters). Any relevant clarifications necessary to ES Chapter 9 have been highlighted and are provided within the revised version of this chapter submitted at Deadline 2. **Habitat loss** - The only habitat of conservation significance that will be lost as a result of the construction of the substations/power converters is the hedgerow loss associated with the construction of the NGET substation in the Southern Site Area (circa 70m). However, this loss would not occur if the NGET substation were moved to the west out of the Project site. All other habitat loss associated with the substations/power converters would be arable/grass ley.

ExQ1	Question to	Question	Applicant's Response
			Dust/emissions – dust/emissions associated with the construction of the substations/power converters will be controlled via the Dust Management Strategy, as set out within the oCoCP **[APP-232]**. The substations/power converters do not generate dust/emissions during operation. **Lighting** – lighting during the construction of the substations/power converters will be controlled as per the commitment to a Construction Artificial Light Emissions Plan to be produced following the principles set out in the oCoCP **[APP-232]** to ensure that impacts to nocturnal wildlife are limited. As per section 2.5 of the Outline Operational Management Plan **[APP-234]**, there will be no continuous lighting during operation. Lighting of the electrical infrastructure compounds (including the substations but not the power converters) would comprise a combination of manually operated lighting and PIR motion sensor activated security / emergency lighting. This lighting would be directionally inwards and downwards within the compound and designed in such a manner to avoid any spill onto existing boundary features. The impact/effect of such lighting on ecological receptors would therefore be negligible. **Noise** – Noise emitted during the construction of the substations/power converters would be no greater than that to construct the Project as a whole. As such, there may be some temporary disturbance of wildlife using the hedgerows near to the location of such features but such an impact would be negligible/low magnitude and negligible/minor adverse significance. Noise emissions during operation of the substations/power converters is set out in ES Appendix 13.1 Operational Phase Noise **[APP-213]**. This describes the emissions as being a continuous noise 'a hum' rather than an impulsive 'bang'; it is the impulsive noises that create startle effects in ecology receptors sensitive to noise (some species of bird, for example). As such, no noise impacts during operation are predicted on any ecology receptor. **Electro-magnetic fields** – As set out in section 2.9.58 of NPS EN-5, '*there is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences'*. As such, impacts from EMF on ecology receptors are considered to be insignificant.
Q1.8.4	Applicant	**Cumulative impacts in the Environmental Statement**	The construction of the NGET substation outside of the Order Limits was considered within ES Chapter 20 **[APP-057]**. As set out there, since the movement

ExQ1	Question to	Question	Applicant's Response
		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.	of the NGET substation would be to additional agricultural fields, there would be no additional significant effects beyond those assessed from this movement. The replacement of the NGET substation with panels within the Project site would mean that the land covered by the substation would no longer be impermeable hardstanding but grassland managed as the rest of the site, via conservation grazing as set out in the oLEMP **[APP-235]**. Further, the hedgerow loss between the main Project substation and the NGET substation would no longer occur (see crossing H13.01 **[EN010147/APP/12.8 Sheet 13, Details Plan 1]**), decreasing the overall length of hedgerow loss by circa 70m (this would have been the single largest length of hedgerow loss within the Project).
Q1.8.5	Applicant	**Buffer zones** 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 evidentially robust. Signpost exactly where these buffers are secured in the relevant management plans and the dDCO.	As set out in Table 9.8.1 of ES Chapter 9 **[PDB-008]**, the various buffer zones for designated sites are secured via their inclusion in the Outline Code of Construction Practice (oCoCP) **[APP-232]**, sections 1.10.10 *et seq*. Compliance with the CoCP is secured via Requirement 11 of dDCO **[REP1-004]**.
Q1.8.6	Applicant Natural England	**Skylarks** Skylark plots are proposed within the proposed development. 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) Skylark have been recorded using solar farms in the majority of studies completed that have examined bird abundance at operational sites. For example, research published by the University of Lancaster and Solar Energy UK found that they were present across 71% of solar sites studied (https://solarenergyuk.org/wp-content/uploads/2024/05/SEUK-2024-Solar-Habitat-Report.pdf). Therefore, the provision of areas of open ground with bare/little vegetation within the arrays (the skylark plots) will provide areas of open habitat for this species (and others) to forage in both during the breeding season and over winter. Note that it is not intended for the plots to act as nesting sites for skylark; there is no evidence that they provide the habitat necessary for such activity. They are intended as open-ground features to improve foraging opportunities for breeding skylark that are nesting in either the surrounding landscape or in the archaeology areas within the Project site that will be managed specifically to support nesting skylark. 2) Since the plots are intended to provide foraging habitat for skylark rather than nesting, the use of sheep grazing at conservation stocking rate (as proposed for

ExQ1	Question to	Question	Applicant's Response
			the Project) will generate and then help maintain a diverse habitat structure that is important for skylark foraging.
Q1.8.7	Applicant Natural England	**Wintering bird assemblage** 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. Why is displacement considered temporary when, post-construction, the operation of the solar farm would be in place for 40 years?	As set out in section 9.9.99 *et seq.* of ES Chapter 9 **[PDB-008]**, the impact of habitat loss on wintering birds is considered to be of moderate adverse significance and long term due to the loss of habitat across the Project site. The use of the term 'temporary' in section 9.9.99 was intended to convey that the impact would be temporary until replacement foraging opportunities created within the Project (as set out in section 9.9.100) would be available for foraging birds once established. However, the overall loss is still considered to be significant and long term (as set out in section 9.9.101/102). Table 9.16.1 shows that the magnitude of effect for loss of habitat is medium (M) on a receptor of medium (sensitivity) resulting in a moderate adverse (ModA) significance effect.
Q1.8.8	Applicant	**Bat mitigation** 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.	As set out in the Statement of Common Ground between the Applicant and Natural England [**REP01-028**], discussions on this matter are on-going. Further survey work and data gathering was completed in 2024 alongside further survey work in spring 2025. Data will be provided to the Examination as a separate bat technical note as soon as analysis is complete. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report **[APP-153])** will be used to determine the extent of the 'appropriate buffers' for bats that the Project has committed to implementing (ES Appendix 6.1 Project Mitigation Measures and Commitments Schedule **[APP-129]** Commitment 9.20). Data will also be used to address Natural England's other concerns with respect the bat survey data and impacts to bats.
Q1.8.9	Applicant	**Dormouse** Natural England's RR [RR-0761] details comprehensive concerns regarding dormouse and the level of protection in the Outline Landscape and Ecology Management Plan	The oLEMP [**EN010147/APP/7.6.3**] will be updated to account for Natural England's concerns with respect to hedgerow management and dormice. The updated oLEMP, Rev 1, is submitted at Deadline 2.

ExQ1	Question to	Question	Applicant's Response
		(OLEMP). Set out to the ExA what is going to be done, and when, to resolve these fundamental concerns.	
Q1.8.10	Applicant Natural England	**Monitoring** 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? Natural England: Do you have any concerns about the scope of monitoring being proposed?	The Applicant recognises the importance of confirming that mitigation and enhancement measures implemented as part of the Project are appropriately monitored to ensure claimed benefits are realised. As such, an initial programme of monitoring was developed and listed in Table 9.10.1. This has subsequently been expanded and is presented in a revised Table 9.10.1 in ES Chapter 9, aligning with a revised Table 13.1 of the oLEMP **[APP-235]** with both the revised ES Chapter 9 and oLEMP submitted at Deadline 2. Table 9.10.1 has been updated to include the habitat monitoring to be undertaken (grasslands, water courses, woodlands, trees, hedgerows and ponds) along with birds, bats and invertebrates (as indicator species of successful habitat creation). In addition, licence requirements mean that the Project will also undertake monitoring for great crested newt, dormice and badger.
Q1.8.11	Applicant Natural England	**Piling in the Environmental Statement** 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. 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. Explain why the construction has not been explicitly or separately assessed the disturbance impacts arising from piling on any species in ES Chapter 9. Natural England: Provide any comments you wish on this situation.	As set out in Table 9.7.1 Maximum Design Scenario of ES Chapter 9 **[PDB-08]**, the piling associated with the construction of the Project was considered as a disturbance impact and was therefore included within the assessment from section 9.9.214 *et seq*. of the chapter. Although the impact from disturbance from piling was not separately assessed under the construction-stage, it was included in the consideration of the magnitude of impact and corresponding significance of effect of the disturbance effect overall. This is highlighted by the fact that disturbance impacts/effects were concluded to be of a lower magnitude/significance for decommissioning precisely because decommissioning did not require piling (for example, as stated in section 9.9.336 of ES Chapter 9).
Q1.8.12	Applicant Natural England	**Noise impacts to wildlife** ES Chapter 13 [APP-050], Table 13.25, sets out that there would be high noise impacts where a	The thresholds set within Table 13.25 are worst-case assuming the use of large-scale piling rigs. It is highly unlikely that any such large-scale equipment would be necessary and therefore, these thresholds are highly precautionary. Also, as set

ExQ1	Question to	Question	Applicant's Response
		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.	out in section 13.9.11, noise impacts generated during piling would be transient, only occurring for a short period in any one location. The potential effects of noise and associated disturbance on ecology receptors is considered within section 9.9.214 *et seq*. in ES Chapter 9 Ecology and Biodiversity **[PDB-008]** with the conclusion that for most receptors, disturbance impacts would be of negligible or minor adverse significance. Noise impacts during construction are controlled following the oCoCP **[APP-232]**.
Q1.8.13	Applicant	**Sites of Special Scientific Interest** 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.	An updated Chapter 9 incorporating a revised Table 9.6.2 has been submitted at Deadline 2.
Q1.8.14	Environment Agency Natural England Beds Bucks Oxon Wildlife Trust	**Lack of survey data** 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. 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?	
Q1.8.15	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	

ExQ1	Question to	Question	Applicant's Response
		measures would you expect/ request the Applicant to adopt and why?	
Q1.8.16	Applicant	**OLEMP completion** Complete Table 13.1 in the OLEMP [APP-228], removing all 'to be confirmed' with an appropriate plan of monitoring.	An updated oLEMP **[APP-235]** with Table 13.1 completed submitted at Deadline 2.
Q1.8.17	Applicant	**Licensing** Natural England's RR [RR-0761] references the need to obtain various licenses for the Proposed Development. 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.	1) The requirement for these licences is set out in rows 1 and 2 of Table 1 of **[APP-035]**. 2) No, the licences are not included or provided for in the dDCO. These are separate consents granted under different legislation that will be obtained by the Applicant were Development Consent to be granted. The Applicant is engaging with Natural England's Wildlife Licensing Service (NEWLS) and will provide them with draft licence submissions for assessment. The aim will be to enable NEWLS to issue Letters of No Impediment (LONI) to the Examination to confirm that, should the SoS be minded to grant Development Consent for the Project, that there is no ecological impediment to the necessary licences being granted, i.e. that the DCO would be implementable from the perspective of the legislation that the licences are granted under. 3) Draft licences will be submitted to NEWLS review by Deadline 3.

2.9 Q1.9 Environmental Impact Assessment

ExQ1	Question to	Question	Applicant's Response
Areas for further evidence			
Q1.9.1	Applicant	**Baseline, methodology and scope of assessments** 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	The Applicant wrote the ES chapters. The content of the ES chapters was influenced by: - The engagement with the host authorities via the Planning Performance Agreement first established in February 2024;

ExQ1	Question to	Question	Applicant's Response
		discounted, or otherwise the Applicant rejected Council requests on the grounds of proportionality. Could the applicant: 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?	- The engagement with the host authorities via consultation exercises, comprising: - A non-statutory phase one consultation on early-stage proposals, held for seven weeks between 03 November 2022 and 22 December 2022; - A statutory phase two consultation on more detailed proposals, including the Preliminary Environmental Information Report (PEIR), held for ten weeks between 30 November 2023 and 08 February 2024. This phase of community consultation under Section 47 of the 2008 Act was held in parallel with consultation under Sections 42 and 48 of the 2008 Act; - A targeted consultation with Section 42 consultees and the local community on changes to the proposals, focusing on specific changes that have been made across the site, held for six weeks between 14 June 2024 and 28 July 2024; and o A further targeted consultation with Section 42 consultees and the local community, focusing on one specific change within the Central Site, held for four weeks from 15 August 2024 to 15 September 2024. - Engagement with the host authorities via a Planning Performance Agreement first established in February 2024. - The Applicants team expert judgement and experience of the EIA regulations and their knowledge of the local area (RPS who were responsible for the ES, are a locally based planning and environmental consultancy with good local knowledge of the area); It is correct to say that where comments and recommendations were made by the host authorities in terms of the content of the ES, those were not expressly responded to at the time. However, these were not ignored but our responses were incorporated into the Applicants Consultation Report **[APP-024]** and in particular sections 12, 13 and 14. In addition, Chapter 6 of the ES **[APP-043],** records the changes made to the Project since the PEIR stage and are captured in section 6.2 and Table 6.2. In respect of the methodologies for topic areas, individual chapter authors were encouraged to make contact with their counterpart to agree methodologies and commence SoCG's as early as 2022. The methodologies used, and the degree to which they were discussed and/or agreed in advance with the relevant authority or statutory consultee varied, but in some cases are set out and described in topic chapter of the ES **[APP-038 to 058].** At Scoping Stage **[APP-125],** June 2023,

ExQ1	Question to	Question	Applicant's Response
			each author set out their study area, scope of assessment, guidelines used for methodology/approach to assessment, and matters to be scoped out. The scoping opinion **[APP-126],** July 2023, made limited comment on the methodologies that were proposed by the Applicant and then were then acted upon for the EIA. Whilst these methodologies were available to host authorities and other statutory consultees, they were not in every case followed through as fully as the Applicant would have hoped, nor were all agreed in advance. However, the ExA is aware that SoCG are ongoing with key consultees and if there are differences in terms of methodology these will be set out. However, no material difference in approach is expected. In addition, the Applicant paid due regard to the 'Applicants Assessment' sections of NPS EN-3 when approaching assessment of relevant topic areas. The concept of proportionality is raised by the ExA and the Applicant can confirm that this approach was applied as advocated by the Institute of Environmental management and Assessment (IEMA) of whom RPS, the Applicants planning and environmental consultant, is a founding member. In particular, given the size of the site, the Applicant would draw the following topic areas to the attention of the ExA, where a proportionate approach was influential in terms of the baseline and/or assessment: - Landscape and Visual impact assessment: In relation to proportionality in the LVIA, the Applicant has adhered to best practice guidance as set out in GLVIA3. When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. Paragraph 3.32 of GLVIA3 explains that there are no hard or fast rules about what effects should be deemed to be significant. The assessment within Chapter 8: Landscape and Visual Impact Assessment **[APP-045]** are influenced by the proportionality principle expressed in paragraph 1.17 of GLVIA3 "identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that assessment should be tailored to the particular circumstances in each case."

ExQ1	Question to	Question	Applicant's Response
			For the purposes of the Botley West Solar Farm Project, those effects of Moderate adverse or below are considered to be not significant. Taking the proportionality approach to the assessment, it is judged that having Moderate adverse as significant would have resulted in a disproportionate level of significant effects, when considering the circumstances of individual landscape and / or visual receptors. LI TGN-2024-01 further clarifies this approach stating that "…if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not." (Issue / Question 3(5), Page 8). It is the Applicant's position that the methodology used to assess the landscape and visual effects, of the Botley West Solar Farm Project, follows best practice guidance. The judgements made in the Landscape and Visual Impact Assessment (LVIA) are clear, transparent, correct and proportionate to the Project. - Heritage: With the trial trenching, the Applicant used the results of the geophysical survey and the aerial photo/LiDAR review to guide the initial approach to trial trenching – this was agreed with the Lead Archaeologist at Oxford Council Archaeology Service. The Applicant ground-tested the results of these non-intrusive surveys and found that they were highly accurate across all of the Project Site. This allowed the Applicant to take a focused and proportionate approach to the trial trenching rather than undertaking the work on a fixed percentage. The Applicant has also written an additional section on proportionality in the Rev 1 of the Settings Assessment (Appendix 7.5). This sets out how and why the Applicant has adopted a proportionate approach to the assessment, rather than undertaking individual assessments of large numbers of Grade II listed buildings that have no intervisibility with the Project Site and for which the outcome would either be No Change or Negligible adverse effect – the purpose of EIA is to identify the likely significant effects rather than hundreds of insignificant ones. - Hydrology and flood risk:

Following engagement with the EA on modelling, the Applicant has sought to steer development away from the flood zones. This is with a view to reducing the reliance on the modelling outputs.

To ensure the hydrology/flood risk assessment is proportionate the Applicant has steered development to lowest areas of flood risk (Flood Zone 1). For smaller catchments (below 3 km2), where EA fluvial modelling is constrained, the Applicant has utilised EA surface water risk mapping having undertaken a catchment analysis to ensure surface water flood extents are a reasonable representation on potential flows and considers climate change. The approach was agreed with the EA via a number of technical notes.

- Arboriculture:

Given the size of the site, and the Applicants desire not to remove trees and only limited amounts of hedgerow, the Applicant considered it would be disproportionate to survey all trees and hedgerows within the Order Limits. Instead, a targeted approach was taken whereby the ecologists surveyed those hedgerows and trees that may be affected by the development e.g. dormice, bat roosting and foraging corridors, and the arboriculturist targeted hedgerows and trees that might be affected by the development, including a survey throughout the site for veteran trees.

- Human health:

In relation to scoping, the IEMA Guide: Effective Scoping of Human Health in Environmental Impact Assessment (2022) states "The scoping exercise should be proportionate, focusing the assessment to likely and potentially significant population health effects of the project." It goes on to state "There can be a temptation to scope in a long list of wider health determinants to avoid the risk of later challenge. This would be contrary to proportionality and could be detrimental to delivering an effective assessment of the likely significant health effects." The Scoping Opinion [APP-125] response from the United Kingdom Health Security Agency echoes this position, stating "…there is a need to ensure a proportionate assessment focused on an application's significant effects." The scope of determinants of health assessed by Volume 1: Chapter 16: Human Health of the ES [APP-053] therefore represents a proportionate approach.

In relation to assessment, Public Health England's Advice on the content of Environmental Statements accompanying an application under the NSIP

ExQ1	Question to	Question	Applicant's Response
			Regime states (2021) states: "Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology." … "PHE's expectations are that the proponent of an NSIP will conduct a proportionate and evidence-based assessment of the anticipated direct and indirect effects on health and wellbeing in line with the relevant regulatory and policy requirements." The Volume 1: Chapter 16: Human Health of the ES [APP-053] qualitative methodology is a proportionate approach in reaching evidence-based professional judgements. The approach follows the methods of the IEMA Guide: Determining Significance for Human Health in Environmental Impact Assessment (2022), which states that the guide "presents a framework that supports a proportionate approach that can apply to all scales of EIA." Volume 1: Chapter 16: Human Health of the ES **[APP-053]** paragraph 16.5.12 illustrates the application of the concept of proportionately within the health assessment, stating: "A change in a determinant of health affects does not equate directly to a change in population health. Rather the change in a determinant alters risk factors for certain health outcomes. The assessment considers the degree and distribution of change in these pathways. The analysis of health pathways focuses on the risk factors and health outcomes that are most relevant to the determinants of health affected by the Project. As there are both complex and wide-ranging links between determinants of health, risk factors and health outcomes, it would not be proportionate or informative for an assessment to consider every interaction." A further example is provided at paragraph 16.4.43 in relation to the approach taken to the future baseline, noting "It would not be proportionate (or consistent with the qualitative assessment approach taken) to quantitatively model the population's future health. This reflects the complexities of interactions between the wider determinants of health, as well as the potential for macro-economic changes in the next decade that are hard to predict. Any predication would have such wide error margins that it would greatly limit the value of the exercise. Annual national population health trend forecasting is undertaken as a government public health activity(Department of Health and

ExQ1	Question to	Question	Applicant's Response
			Social Care, 2023; Office for National Statistics, 2021) and has been taken into account by the health assessment." Other examples of where the health assessment **[APP-053]** has been proportionate include: using existing public health data to inform the baseline rather than new surveys; cross-referring to, rather than duplicating, other assessment findings to reduce review burden by health stakeholders; integrating the Health Impact Assessment within the ES Human Health chapter to avoid duplication; and the approach of including only necessary, relevant, enforceable, precise and reasonable mitigation or enhancement measures in Table 16.23, e.g. in limiting the extent and duration of monitoring of future PRoW use.
Q1.9.2	Applicant	**ES Chapter 17 et al** 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?	The matrix to which Mr Roderick refers is presumed to be the one contained with Chapter 17 of the ES, particularly Table 17.12 **[APP-054]** which deals with sensitivity of the receptor and the magnitude of impact. The approach taken is explained fully and is an approach the author has taken for many years. The significance of the effect upon agricultural land use and PRoW has been determined by taking into account the sensitivity of the receptor and the magnitude of the impact. The method employed for this assessment is presented in Table 17.12. Where a range of significance levels is presented, the final assessment for each effect is based upon expert judgement. In all cases, the evaluation of receptor sensitivity, impact magnitude and significance of effect has been informed by professional judgement and is underpinned by narrative to explain the conclusions reached. 17.5.10 For the purpose of this assessment, any effects with a significance level of minor or less are not considered to be significant in terms of the EIA Regulations. More generally, the assessment of agricultural land use and PRoW has been undertaken in accordance with the methodology set out in Volume 1, Chapter 4: Approach to Environmental Assessment of the ES in addition to the following guidance, where appropriate: • Design Manual for Roads and Bridges (DMRB) Volume 11, LA109: Geology and Soils (Highways England et al., 2019); • DMRB Volume 11, LA112: Population and Human Health (Highways England et al., Revision 1 2020b);

ExQ1	Question to	Question	Applicant's Response
			• Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009); • Agricultural Land Classification of England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land. Ministry of Agriculture, Fisheries and Food (MAFF) (1988); • Institute of Environmental Management and Assessment (IEMA) IEMA Guide: A New Perspective on Land and Soil in Environmental Impact Assessment (IEMA, 2022); • Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049) (Natural England, 2012); and • Guide to Assessing Development Proposals on Agricultural Land (Natural England, 2021).
Matters of Clarification			
Q1.9.3	Applicant	**Procedural Deadline B** 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.	Please refer to **Appendix 5** of this document which responds to Question Q1.9.3 of the Examining Authority's (ExA) first set of Written Questions [**PD-008**] and relates to providing reassurance to the ExA that all assessment reporting in the Environmental Statement (ES) has been completed against the worst-case scenario.

2.10 Q1.10 Flood Risk, Hydrology and Water Resources

ExQ1	Question to	Question	Applicant's Response
Areas for further evidence			
Q1.10.1	Applicant	**New National Flood Risk Assessment** 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. If no update is necessary, please provide a detailed justification.	We can confirm that an updated FRA [**APP-166**] and Chapter 10 of the ES **[APP-047]** will be submitted by DL3.
Q1.10.2	Applicant	**Revision to the NPPF** 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).	The principles of the Exception Test remain the same, stating: "*It should be demonstrated that:* *the development would provide wider sustainability benefits to the community that outweigh flood risk; and* *the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall*." As set out at NPPF paragraph 178 2024, and Flood risk and coastal change - GOV.UK – accessed June 2025. Therefore, no material change in approach is required.
Q1.10.3	Applicant	**Flood risk assessment – minor errors and omissions** 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	We can confirm that an updated FRA [**APP-166**] will be submitted by DL 3 and will include updates in line with the EA's RR [**RR-0308**].

ExQ1	Question to	Question	Applicant's Response
		updated version of the FRA is to be submitted into the Examination.	
Q1.10.4	Applicant	**Flood defences – construction phase** 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. Given the importance of ensuring that such flood defences are adequately protected, please confirm why the clearance distance cannot be provided during the Examination.	The Applicant confirms that HDD depth under main rivers would be *at least* 1.5m below flood assets and 2m below hard bed, in line with Commitment 10.4 of Table 10.26 in ES Chapter 10 [**APP-047**]. The minimum depths in the Commitment Table were established using EA guidance published on Gov.UK Flood risk activities: environmental permits - GOV.UK which states "the service crossing is at least 1.5m below the riverbed along its whole length, and the same height is maintained for at least 5m beyond each bank (measured from the top)." Clearance distances depend on the final detailed design of the project, which is usually developed after consent is obtained. At the Examination stage, the design remains at a preliminary or outline level, and specific site conditions, engineering solutions, and construction methods have yet to be finalised. Providing fixed clearance distances before consent could constrain design flexibility and may lead to either overly conservative or insufficient protective measures. Post-consent design allows for optimisation to balance construction feasibility, environmental protection, and flood defence integrity. The actual depth of the HDD at the main rivers would likely be deeper than the minimum commitment, potentially a minimum of 5m. Drill profiles will be determined and confirmed depths provided during detailed design to ensure that an appropriate vertical depth is provided.
Q1.10.5	Applicant	**Flood defences – maintenance plan buffer zone** 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]. Please signpost to where this is detailed within the outline OMP.	This will be updated within the outline OMP [**APP-234**] and will be submitted by Deadline 3.
Q1.10.6	Applicant	**Potential impact of damage to existing field drainage**	Decommissioning activities may involve the removal of infrastructure and restoration works that can disturb existing field drainage. At this time it is not possible to predict the potential impacts that may be relevant. Some mitigation

ExQ1	Question to	Question	Applicant's Response
		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]).	measures used during construction may not be applicable or as effective during decommissioning, potentially leading to greater environmental disturbance. In line with NPS standards, a decommissioning and enhancement plan, which will detail mitigation and best practice measures to reduce potential impacts, will be developed in consultation with the local planning authority, local community and key stakeholders and will form an integral part of the DCO application. Despite the mitigation measures detailed above, it was deemed appropriate to assign a minor adverse significance during decommissioning. This reflects a precautionary approach acknowledging uncertainties around the full extent of decommissioning impacts, whereas construction impacts are better defined and mitigated, resulting in a lower significance rating.
Q1.10.7	Applicant	**Potential impact of damage to existing water supply and wastewater drainage infrastructure** 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]).	Decommissioning activities may involve the removal of infrastructure and restoration works that can disturb existing water supply and wastewater drainage in ways that are less predictable or more extensive than construction. Some mitigation measures used during construction may not be applicable or as effective during decommissioning, potentially leading to greater environmental disturbance. In line with NPS standards, a decommissioning and enhancement plan, which will detail mitigation and best practice measures to reduce potential impacts, will be developed in consultation with the local planning authority, local community and key stakeholders and will form an integral part of the DCO application. Despite the mitigation measures detailed above, it was deemed appropriate to assign a minor adverse significance during decommissioning. This reflects a precautionary approach acknowledging uncertainties around the full extent of decommissioning impacts, whereas construction impacts are better defined and mitigated, resulting in a lower significance rating.
Q1.10.8	Applicant	**Impermeable areas** Within the Order limits what are the total impermeable areas associated with: a) the current site; and b) the proposed development site layout?	The current site (pre-development) is mainly agricultural farmland, deemed to a 'greenfield'. The total impermeable area introduced by the proposed development is limited to approximately 6.1 ha. Most infrastructure (including solar panels) is elevated and underlain by vegetated ground. Key impermeable permanent elements are: • PCS Units: 0.63 ha

ExQ1	Question to	Question	Applicant's Response
		Please signpost to this information or provide separate calculations for both temporary and permanent infrastructure.	• Secondary Substations: 0.7 ha • Applicant Substation: 0.98 ha • NGET Substation if within Order limits: 3.8 ha Please refer to 6.3 - ES Chapter 6 - Project Description **[APP-043],** for more information on the dimensions of each.
Q1.10.9	Applicant	**Flood risk assessment** 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?	The sentence should read "The site is not considered to be at a low risk of groundwater flooding." We can confirm that an updated FRA [**APP-166**] will be submitted by deadline 3 and will include an updated version of this sentence.
Q1.10.10	Applicant	**Flood risk assessment** 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?	Surface water panels have been sequentially steered away from high-risk areas where possible; however, due to design constraints, this has not been possible in all locations. Therefore, in line with the NPPF, solar panels have been placed with an adequate freeboard above modelled flood depths. This is 300mm + in most locations, with limited areas having a 200mm freeboard. This is considered appropriate for several reasons, which are detailed below. The solar panels are designed to be elevated above the modelled flood depths, the solar panels themselves are inherently waterproof. This ensures that the operational components and electrical equipment are protected from direct inundation. Surface water flooding typically involves shallow, temporary water pooling rather than deep, prolonged inundation. The elevated mounting structure allows floodwaters to pass beneath the panels without impacting their structural integrity or function. The design and installation of the panels have been planned to avoid impeding natural surface water flow or increasing flood risk elsewhere. The open framework of the solar arrays allows water to flow freely beneath, minimising any potential contribution to surface water flooding severity or duration. In summary, while the solar panels are situated in areas susceptible to surface water flooding, their elevation above flood levels, combined with design measures

ExQ1	Question to	Question	Applicant's Response
			that allow floodwaters to pass unimpeded, ensures that the risk to the development and surrounding area is appropriately managed and minimised.
Q1.10.11	Applicant	**Conceptual Drainage Strategy** 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. 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?	Appropriate seeded vegetation would be placed below and between the tables of the Solar PV modules. We can confirm that this would be the same as managed through livestock grazing. The grassland management within and around the solar arrays will be subject to a new conservation grazing regime. These areas will be seeded to a modified grassland habitat type. Once established, these areas will be grazed (primarily by sheep). The grazing regime will be at a low stocking rate with the primary aim of ensuring the management of more vigorous grass species, such that they do not dominate swards. A pause in the grazing over much of the site will allow grasses and wildflowers to set seed. The vegetation is proposed to intercept precipitation, reduce erosion and aid in soil cohesion (as compared to arable cropping) and there would be limited risk of over grazing due to the low stocking rate. Further details are provided in the updated Outline Landscape and Ecology Management Plan [**EN010147/APP/7.6.3**] Rev 1.
Q1.10.12	Applicant	**Localised flood events** 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.	The proposed solar farm development does not include or require drainage or flood risk mitigation measures off-site as part of the Development Consent Order (DCO). This is because the project is designed by the NPS and NPPF to manage surface water runoff within the site without exacerbating existing flood conditions beyond the site boundary. Flooding events at Elms Road and local highways, as referenced by Mr. Stuart Thompson, are due to existing drainage constraints and extreme weather events unrelated to the proposed development. Responsibility for managing these off-site flood risks lies with local highway authorities and drainage agencies, rather than the solar farm project. While no off-site mitigation is proposed through the DCO, including Elms Road, the project commits to monitoring drainage performance on-site and will cooperate with local authorities if any unforeseen drainage issues arise during construction or operation. Details of mitigation and management of the project are set out in the Outline Code of Construction Practice [**APP-232** and **APP-233**], Outline

ExQ1	Question to	Question	Applicant's Response
			Operational Management Plan [APP-234] and Outline Decommissioning Plan [**APP-236**].
Q1.10.13	Applicant	**Assessment of groundwater and surface water flood risk in Cumnor Parish** Please provide bespoke comments on the flood risk report prepared by GWP Consultants LLP on behalf of Cumnor Parish Council, submitted at DL1.	A separate technical note has been prepared, in response to this flood risk report, and is submitted alongside DL2, reference: Appendix 2: Flood Risk Technical Note - Solar Panel Runoff v1.
Q1.10.14	Applicant	**Preliminary Floor Risk and Drainage Appraisal – Worton Park** 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.	A separate technical note has been prepared, in response to this flood risk report, and is submitted alongside DL2, reference: Appendix 3: Flood Risk Technical Note - Worton Park v1.
Hydrology and Groundwater			
Q1.10.15	Applicant	**Drainage layout** 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. Please also confirm how the field beneath the solar panels will be managed during construction, operation and reinstatement.	A high-level Conceptual Drainage Strategy has been submitted as part of the DCO application (Appendix 10.2 to the Environmental Statement). This document sets out the proposed surface water drainage approach across all infrastructure areas. There will be no connection to the local foul or surface water Thames Water drainage network. The strategy incorporates Sustainable Drainage Systems (SuDS), including: • Gravel-filled infiltration trenches: proposed for each PCS unit and HV Transformer • Detention basins: proposed at the Applicant and NGET Substations to manage runoff • Vegetated filter strips: planned between and beneath PV module rows to slow runoff and support infiltration These measures are designed to attenuate runoff in accordance with greenfield discharge rates and a 1-in-100-year storm event plus 25% climate change uplift, in line with Environment Agency guidance.

ExQ1	Question to	Question	Applicant's Response
			At this stage, the strategy is supported by indicative calculations only, based on maximum design assumptions. A detailed drainage layout with identified discharge points will be developed post-consent, during the detailed design phase, following site-specific infiltration testing. In regard to field management beneath solar panels the following is proposed. <u>Construction Phase:</u> The internal access tracks will remain untreated and unsurfaced to ensure they stay permeable, with no use of tarmac or other hard materials to the surface of the track. In areas with soft ground or where vehicle access is required during construction, temporary surfacing may be required and will be removed afterwards. Permeable Geotextile membranes will be placed beneath the aggregate to prevent it cross contaminating or sinking and to minimize soil compaction. <u>Operational Phase:</u> Fields beneath panels will maintain permanent vegetated cover, with seeded filter strips used to reduce erosion and enhance infiltration Vegetation will be managed through mowing or light grazing, supporting infiltration and soil health. <u>Decommissioning:</u> Infrastructure will be removed with minimal topsoil disturbance, allowing return to agricultural land use.
Q1.10.16	Environment Agency	**Water Framework Directive (WFD)** Are you content with all aspects of the WFD assessment [APP-174] and are you satisfied with the conclusions reached therein?	.
Rivers and Watercourses			
Q1.10.17	Applicant	**Prevention of pollution** 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.	The outline CoCP [**APP-232** and **APP-233**] will be updated at Deadline 3 to require a bentonite breakout plan is produced post consent and will detail the management of the risk of any potential leakages.

ExQ1	Question to	Question	Applicant's Response
Control of Pollution and contaminants			
Q1.10.18	Applicant	**Impacts from ground contamination on future site users** 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. Please confirm whether this is an oversight and if so, amend accordingly.	The significance of effect regarding impacts from ground contamination on future site users during operation and maintenance is detailed in paragraph 11.9.14. For impacts from ground contamination on off-site land users the mitigation implemented during the construction phase for future site users will ensure any existing contamination will have been remediated and/or assessed as suitable for use (and will not pose unacceptable risk to human health of the environment). However, Table 11.19 identified the magnitude of impact during operation on off-site land users as 'not applicable'. This is an oversight. We can confirm that an updated 6.3 - ES Chapter 11 - Ground Conditions [**APP-048**] will be submitted by Deadline 3 and will include significance of effect from ground contamination on off-site land users during operation.

2.11 Q1.11 Geology and Land Use

ExQ1	Question to	Question	Applicant's Response
Farming Operations			
Q1.11.1	Applicant	**Loss of agricultural land** Paragraph 5.11.12 of NPS EN-1 states "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)". Please explain how the test in paragraph 5.11.12 of NPS EN-1 is satisfied in respect of the Proposed Development?	The ALC and soil surveys (Table 2 of ES - Appendix 17.1 **[APP-223])** determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicant has sought to, as far as possible, avoid permanent impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 **[APP-042]).** Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 **[APP-054],** paragraph 17.9.6). Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 **[APP-054],** paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 **[APP-054],** paragraph 17.9.8).

ExQ1	Question to	Question	Applicant's Response
Q1.11.2	Applicant	**Conservation grazing** 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. 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? If not, has the cost to the affected land holdings been factored into the socioeconomic assessment?	It is the intention that Blenheim would expand the current existing livestock business, creating further local employment and building further on well-established experience in this type of husbandry. Conservation grazing will be supplemented by cutting where necessary, with any hay used locally to support farming businesses. Should Blenheim not be able to expand their existing livestock business sufficiently, the estate is also in contact with three local farmers who partner with the Estate, alongside their own businesses, to provide conservation and more intensive livestock grazing.
Q1.11.3	Applicant	**Conservation grazing** 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? If a delay is anticipated, please confirm the duration of such a delay. Please also confirm what actions would be taken if the cultivation of suitable grass land fails?	As set out at section 11.1 of the oLEMP **[APP-235]**, it is intended to air establishment of the grassland through the use of grazing or mowing with the intention that from year two following establishment this is at a conservation grazing stocking rate (as set out in Table 11.1 of the oLEMP **[APP-235]**). As set out in section 9.7.3 and 9.7.4 of the oSMP **[APP-233]**, the review of the establishment with interested parties would determine what, if any, remedial actions were necessary, should grassland fail to establish, depending on the issues encountered. At this stage, it is not possible to determine the nature of those remedial actions since they would be specific to the issues. However, potential remedial measures are set out in Table 17.1 of the oLEMP.
Q1.11.4	Applicant	**Agricultural Land Classification (ALC) and soil survey** 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	The Applicant is currently arranging access for the remaining areas of the cable option corridors to be undertaken. This area represents less than 5% of the total survey area, 95% of which has been completed. The area would be affected on a temporary basis during the installation of cables and would be subsequently reinstated. There would be no permanent loss of land within these areas and there would therefore be no implications for the validity of the assessment of effects on agricultural land quality within the environmental statement.

ExQ1	Question to	Question	Applicant's Response
		conditions were not included in the survey. 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? When is it anticipated that such survey work would be undertaken?	The reinstatement of land within these areas would be in accordance with the detailed Soil Management Plan secured as part of the detailed CoCP pre-construction. The outline Soil Management Plan **[APP-233]** identifies at paragraph 9.3.4 that the results of the survey work within the cable option areas would be incorporated into the detailed Soil Management Plan prior to construction. However, the principles already identified with the outline Soil Management Plan and techniques for cable laying are also applicable to those areas that remained un-surveyed currently.
Q1.11.5	Applicant	**Land Classification** 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.	The methodology for the ALC survey is provided in Section 3 of Volume 3, Appendix 17.1: Agricultural Land Classification and Soil Survey Report **[APP-223]**. The survey work initially included the examination of 622 soil profiles across the site together with the excavation of 36 soil pits. Following initial consultation with Natural England in October 2023 (see Table 17.5 of Volume 1, Chapter 17: Agricultural Land Use and Public Rights of Way) on the results of this survey work, it was agreed that a further 40 soil auger observations should be added to further investigate the boundaries of any isolated areas of best and most versatile land that had been identified in the initial survey work. Section 2 of the ALC and Soil Survey report provides the desk top data used to inform the survey and this is also identified in Table 17.8 of Volume 1, Chapter 17: Agricultural Land Use and Public Rights of Way. The author of the land classification survey report is director at Reading Agricultural Consultants, a member of the British Society of Soil Science and has over thirty years' experience in ALC and soil survey. The author of Chapter 17 of the Environmental Statement, and manager of the work with Reading Agricultural Consultants, is also a member of the British Society of Soil Science who has over 30 years' experience in ALC and soil survey.
Q1.11.6	Applicant	**Land holding details** For each of the 10 agricultural land holdings, please either signpost to the below information or provide the following	**Landholding** / **Name and Address of Freeholder** / **Plot Numbers** / **Approximate areas of Land Affected** / **Total Area of Landholding (if known)** / **Purpose**

ExQ1	Question to	Question	Applicant's Response				
		information in a tabular format: 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	Vanbrugh Trustees Ltd The Estate Office Blenheim Palace Woodstock OX20 1PP	1159 ha	4,900 ha.	Solar installation area; landscaping and ecological areas;
			2	Worton Rectory Farms Ltd, Cassington, Oxon OX29 4SU	55.5ha	285ha	Solar installation area; landscaping and ecological areas;
			3	John P. Gee & Sons Limited Denmans Farm, Farmoor Oxford OX2 9NJ	80.5	215ha	Solar installation area; landscaping and ecological areas;
			4	Unregistered/Unknown 11-40 The Chancellor Masters and Scholars of the University of Oxford University of Oxford University Offices Wellington Square Oxford OX1 2JD	8.37	N/A	Cable routing

ExQ1	Question to	Question	Applicant's Response						
			5	Smith and Sons (Bletchington) Ltd Enslow, Kidlington Oxford OX5 3AY	11-04, 11-05' 11-06, 11-31, 11-33, 11-35, 11-36 11-37	33.21	N/A Mixed Farming enterprise together with supplier of primary and recycled aggregates.	Cable Routing
			6	Punch partnerships, Elsley Court 20-22 Great Titchfield Street London W1W 8BE	2-20	0.07	N/A – non-agricultural to be acquired	Cable Routing
			7	Oxford Diocesan Board of Finance Church House Oxford Langford Locks Kidlington OX5 1GF	4-05	3.43	Farmed as part of Perdiswell Farm, see below.	Cable Routing
			8	The Wardens and Scholars of the House or College of Scholars of Merton University of Oxford, Oxford	7-05	3.55	N/A Farmed as part of Clarke Farming Ltd, Park Farm, Woodstock – Farm	Cable routing

ExQ1	Question to	Question	Applicant's Response				
				OX1 4 JD		Mixed farming approximately 1800 acres of grazing land.	
			9	The Sunderland Foundation (as Trustee of the Duke of Marlborough's 1981 settlement) PO Box 175 Guernsey Gy1 4HQ	2-18 3-09 3-13 4-03 4-16	10	N/A Plots 4-03 and 4-16 farmed as part of Perdiswell Farm – see below	Cable routing
			10	Malcolm Stuart Hoskins Price, Perdiswell Farm Woodstock, OX20 1QJ	3-35 4-01 4-02	5.29	Arable holding in excess of 100ha, together with contract farming.	Cable routing
Q1.11.7	Applicant	**Best and Most Versatile Land (BMV)** 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. 1) Please confirm the proportion of BMV land would be unavailable for current farming activities during the	It is only the operational effects on BMV land that are scoped out of the assessment in Table 17.7. The effects of decommissioning have been included in the assessment as explained in Table 17.4 in response to PINS scoping opinion. It has been assessed, on a precautionary basis, that all of the land within the proposed development would be taken out of its current farming operations at the commencement of construction i.e 1351.2ha of agricultural land and that all the BMV land would also be taken out of its current farming operations. The loss of land from farm holdings and the change in the use of the land, in accordance with the landscape, ecology and amenity plan **[APP-228]** is assessed during the construction phase as the land will be taken at the commencement of that phase.				

ExQ1	Question to	Question	Applicant's Response
		Proposed Development's operational lifespan. **2)** Please explain your assertion in Table 17.7, which states "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", 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?	
Q1.11.8	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.	Solar Array Infrastructure Area within fence line boundary — Area (ha) Grade 1 — 1.4 Grade 2 — 79.3 Grade 3a — 326.2 Grade 3b — 575.2 Other Temporary Areas (compounds, lay down, cabling) Grade 1 — 0.0 Grade 2 — 0.2 Grade 3a — 2.9 Grade 3b — 6.3 Non-Agricultural Not Surveyed — 67.0 Landscaping areas (seeding and planting)- Not subject to soil stripping Grade 1 — 0.7 Grade 2 — 15.6 Grade 3a — 60.5

ExQ1	Question to	Question	Applicant's Response	
			Grade 3b	215.3
			National Grid Substation	
			Grade 2	1.8
			Grade 3a	1.1
			Main Substation	
			Grade 3a	0.5
			Grade 3b	0.2
			Total Non-Agricultural Land with Project Boundary.	64.0 ha
Q1.11.9	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.	The principles of grassland establishment are set out in section 11.1 of the oLEMP **[APP-235]** and would be fully detailed in the corresponding LEMP. In summary, following seeding, areas of grassland would be cut/grazed in the first year to a height of circa 40-60mm to help suppress vigorous weeds. Weed management would also be undertaken, as necessary. In the second and subsequent years, it is anticipated that a conservation grazing regime would be established with stocking rates sufficient to maintain a diverse sward structure. Remedial measures, should grassland establishment fail, would be determined towards the end of year 1 and would be determined by the Project Landscape Management team, in consultation with Interested Parties. Potential remedial measures are set out in Table 17.1 of the oLEMP **[APP-235]**.	
Q1.11.10	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?	The outline Code of Construction Practice (oCoCP **[APP- 233]**), secured by Requirement 11 of the draft DCO sets out a series of management plans to support the implementation of the CoCP at Table 1.1 and includes a Dust Management Plan (an outline plan is included as Annex E to the CoCP and a Construction Noise and Vibration Management Plan. Section 1.6.7 of the oCoCP also identifies that an Agricultural Liaison Officer will be appointed in time for the commencement of pre-construction activities and will be the dedicated point of contact for ongoing engagement about practical matters with landowners, occupiers and their agents during the pre-construction and construction process.	
Q1.11.11	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		

ExQ1	Question to	Question	Applicant's Response
		and organic content. Please identify each parcel of affected land/soil on a plan.	
Other land use matters			
Q1.11.12	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 "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 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". Please confirm whether this definition is considered acceptable. If not, please provide a detailed justification and alternative definition.	
Q1.11.13	Cherwell District Council	**Green Belt – The Cherwell Green Belt Study 2023** 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.	

ExQ1	Question to	Question	Applicant's Response
Q1.11.14	Applicant	**Green Belt – Alternatives** 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. Please provide a detailed justification as to why panels located on Grade 2 and 3a quality land have not been removed and/or relocated.	It was considered that BMV soil quality could be preserved in situ under the panels providing the soils were not disturbed. Adherence to a Code of Construction Practise and Soils Management Plan afforded sufficient protection for that resource. Sky lark plots had to be free from development as the birds need clean lines of sight during foraging to avoid predation. The Lead Archaeologist at Oxfordshire County Council and the Applicant reached agreement on the best way of protecting underground archaeology by leaving those areas free of development
Q1.11.15	Applicant	**Green Belt and BMV considerations** 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: 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) The Applicant wishes to alert the ExA that the scenario they now wish to consider in the scenario whereby the NGET substation moves off site, is to move the client main substation and secondary substation onto the site, thus being closer to the point of connection with the repositioned NGET substation, this is more efficient and cost effective. This will be the subject of a second Change Request Application and is notified as part of the Change Request 2 notification. New sizes/areas and yields will be confirmed through this process, including replacement panels of the current client main substation site. 2) The new (reduced) area of loss of BMV will be confirmed through the proposed Change Request process; 3) The VSC will for this additional solar installation is supported by the presumptions in favour of VSC for CNP as set out in the Green Belt case in the Planning Supporting Statement.

ExQ1	Question to	Question	Applicant's Response
Q1.11.16	Applicant	**Green Belt – Very Special Circumstances** 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 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. 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: "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." 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	The Applicant is now proposing six VSC's [REP1-012]. These are: VSC 1 - Meeting the urgent need for secure, clean, renewable energy; VSC 2 - Overall compliance with relevant NPS and relevant parts of approved and emerging plans; VSC 3 – Renewable energy to power the equivalent of 330,000 homes; VSC 4 - Biodiversity Net Gain; VSC 5 – Economic, Educational and Sustainability Benefits; VSC 6 - Landscape and Access legacy. • The Applicant has withdrawn VSC 7 and 8 relating to community benefit fund and discounted electricity prices. Neither are now relied upon for VSC or the planning balance case. Paragraph 1.2.20 of the Applicant's Written Summary of Oral Submissions at the Open Floor Hearings (OFH1 & OFH2) [**REP1-018**] provides further detail on the community benefit package being offered. • The Applicant is relying on VSC 5, economic, educational and sustainability benefits as a VSC and in the planning balance. That is why powers are sought to CA this land if necessary.

ExQ1	Question to	Question	Applicant's Response
		been secured, otherwise confidence in such measures would potentially be low.	
Q1.11.17	Applicant	**Green Belt – weighting to be given to the very special circumstances** 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?	The VSC's referred to in the question are: - VSC 2 - Overall compliance with relevant NPS and relevant parts of approved and emerging plan; - VSC 4 - Biodiversity Net Gain; - VSC 6 - Landscape and Access legacy. The weighting scale to be used by the Applicant for these purposes in descending order are: Substantial, Moderate and Neutral weight. For VSC 2, compliance with the tests in the NPS, the primary basis for taking decisions on NSIP's (s104 (2) of the Planning Act 2008), and within which there are many references to urgent need for significant amounts of large scale energy infrastructure (e.g. NPS EN-1, para 1.1.2) and the substantial weight to be given to this need in assessing applications (e.g. NPS EN-1, para 4.2.6); and the relatively new Critical National Priority (CNP) infrastructure status now given to low carbon and renewable energy development and the strong policy direction afforded to such CNP infrastructure, now presumed to meet any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances (NPS EN-1, para 4.2.16); all point towards Substantial weight being attributed to this VSC 2. This VSC will be secured through the grant of the DCO itself which will provide the necessary consent for the Applicant to deliver the Critical National Priority infrastructure. Compliance with local planning policy and other national planning policy is important but less so (i.e. if there is a conflict between NPS and other policy, the NPS policies should prevail), but still attracts moderate weight. VSC 4 on biodiversity net gain, is another very important policy strand. The Environment Act 2021 included provisions applying certain BNG requirements to the Nationally Significant Infrastructure Projects (NSIP) regime. At >500MW, the Botley West Project is categorised as an NSIP. A BNG requirement is proposed to be imposed on NSIP projects from November 2025, with the level of requirement detailed within a BNG statement(s) presently expected to be set at a minimum of 10%. The consultation sets out that projects which have been accepted for Examination prior to the November 2025 date would not be required to deliver that minimum BNG target but could choose to do so voluntarily. In this context, and noting the position remains subject to further confirmation from Government, whilst there is no legal requirement for the Project to deliver BNG, the design has been developed such that the extent of net gain possible has been maximised within the parameters of the Project.

ExQ1	Question to	Question	Applicant's Response
			Given the following qualitative aspects of the VSC – the significant scale of the Project; the net gain assumed to be achieved (expected to be an overall gain of over 80% [APP-162, page 15]; and that it will endure beyond the normal 30 year period i.e. for the operational life of the solar farm, the Applicant is of the view that Substantial weight should be afforded to VSC 4. This VSC is secured through Requirement 7 of the draft DCO. In respect of VSC 6, again given the significant scale of the project and the substantial number of new trees and hedgerows to be planted and managed, and the way all new planting integrates into the established landscape character, leaving a lasting legacy, improved access and wellbeing, Substantial weight should be afforded to this VSC too. This VSC is secured through Requirement 6 of the draft DCO and the landscape and access provisions to be continued in the final Landscape and Ecology Management Plan.
Q1.11.18	Applicant	**Not inappropriate development** 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 'not inappropriate' 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 [APP235], at paragraph 7.2.4 only, refers to grazing infrastructure. 1) What powers in the DCO allow the Applicant to construct or deliver 'grazing infrastructure'? 2) Define what is meant by 'grazing infrastructure'? 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?	1) Work No. 5(a) includes powers of 'habitat creation and management including grazing' whilst Work No. 6(e) includes powers of 'landscaping and biodiversity mitigation and enhancement measures including sheep grazing'. 2) Sheep grazing will be carried out with an extensive, outdoor flock requiring little fixed infrastructure. There are no requirements for livestock buildings as part of the project. It is likely the sheep flock will lamb on the wider Blenheim Estate in the same way as their existing outdoor flock and that any sheep requiring additional care will be taken back to the existing buildings on Blenheim Estate. Within the project area, low voltage electric fencing and mobile handling facilities will be used to keep sheep where they need to graze. Water troughs will be moved around the grazing areas, connecting into the existing agricultural water network. Where it is not feasible to place water troughs due to the lack of existing water network, mobile water bowsers can be used. 3) Schedule 16 paragraph 2(3) requires any application made to the relevant planning authority for discharge to include a statement to confirm whether it is likely that the subject matter of the application will give rise to any materially new or materially different environmental effects compared to those in the environmental statement and if it will then it must be accompanied by information setting out what those effects are. Therefore, the exercise of the DCO powers may only be delivered if they fall within the environmental framework assessed in the ES. The LPAs will have a right of approval over those proposals as part of the discharge of requirements, including the discharge of Requirement 12 (Operational Management Plan).

ExQ1	Question to	Question	Applicant's Response
Q1.11.19	Applicant	**Green Belt – Begbroke and Kidlington gap** 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? If not, please explain why.	The Applicant didn't regard the relevant field to be a distinct gap between those settlements. Notwithstanding, the Applicant wishes to notify the ExA that the proposed panels and associated cabling on the field in question is proposed to be removed from the Order Limits as part of a second Change Request Application. The reason relates to providing the Oxford Airport with reduced crash risk. The issue of closing this 'gap' and the issue of coalescence will consequently be removed.
Q1.11.20	Vale of White Horse District Council	**Green Belt – NGET substation location** 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.	
Q1.11.21	Applicant	**Temporary field compounds** 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. 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) If consented, the delivery of the solar farm will evolve as part of the procurement processes that will follow. Those decisions are likely to be determined by whoever secures the construction contract. 2) Yes, unless their location happens to coincide with any undeveloped part of the site e.g. field margins, archaeological protection areas (assuming they do not interfere with the protection of those assets), skylark plots, or any other undeveloped part of the Project site. 3) None. Environmental protection measures that may arise from the siting and use of the compounds will be secured through the implementation of the Code of Construction Practice **[APP-232 and APP-233].**

ExQ1	Question to	Question	Applicant's Response
Q1.11.22	Applicant	**Soil Management Plan – mixing of soils** 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?	Section 9.5.5 of the outline Soil Management Plan [**APP-233**] explains that the location of storage mounds would be planned within the detailed management strategy to ensure that the potential for damage to the storage heaps and/or contamination of the heaps from foreign construction materials is limited, as far as possible.
Q1.11.23	Applicant	**Soil Management Plan - stockpiles** How would the suitability of soil stockpiles for restoration be assessed? Please confirm whether the final SMP would include a restoration methodology?	Section 9.7.2 of the outline Soil Management Plan [**APP-233**] identifies that soil samples would be taken from the areas of bunded soils to be used in the restoration of the area to determine nutrient levels and inform proposals for any lime and fertiliser applications that may be required at the beginning of the aftercare period.
Q1.11.24	Applicant	**Soil Management Plan – stockpiles** 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?	Section 9.5.6 of the outline Soil Management Plan **([APP-233]** explains that all storage mounds in situ for more than 3 months or over the winter period, would be seeded and managed to control weeds as necessary.
Q1.11.25	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?	This detail would be contained as part of the detailed Soil Management Plan that would be developed in accordance with the outline Soil Management Plan **[APP-233]**, secured as part of the CoCP in Requirement 11 of the draft DCO.
Q1.11.26	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?	Measures for the proposed management and supervision of the soil handling process are contained in Section 9.2 of the outline Soil Management Plan **[APP-233]**.

ExQ1	Question to	Question	Applicant's Response
		Please provide detail in respect of this process.	
Q1.11.27	Applicant	**Soil Management Plan – Reinstatement** Please confirm why the oSMP does not include measures to return hardstanding to agricultural use?	It has been assumed that, on a precautionary basis, that the main substation may not be decommissioned and therefore that the area of hardstanding at this location may remain.
Q1.11.28	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.	
Q1.11.29	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 [APP233]?	The Applicant is currently arranging access to be able to complete the survey of the remaining cable route option areas. The outline SMP **[APP-233]** at paragraph 9.3.4 also states that the results of the survey work within these areas would be incorporated into the development of the detailed Soil Management Plan prior to construction.

2.12 Q1.12 Habitats Regulations Assessment

ExQ1	Question to	Question	Applicant's Response
Effect of the Proposed Development on its own and In-combination with Other Plans and Projects			

ExQ1	Question to	Question	Applicant's Response
Q1.12.1	Applicant Natural England	**Piling in the HRA** 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. Explain why piling is not considered as a potential pathway and has not been screened into the appropriate assessment.	The closest piling associated with the Project would take place within fields to the north of Cassington and the A40 circa 1.2km from the Oxford Meadows SAC (the closest point of the Project to the SAC is the cable corridor rather than where any piling will occur). The impact of disturbance (including noise during construction from activities such as piling) is screened from further assessment in section 4.7.1 of the HRAR **[APP-163]** on the basis of the distance and that, given the distance and the noise/disturbance generated by the intervening villages/roads, there would be no greater effect than what is already generated by these roads and villages and would not add to these effects, but rather be imperceptible because of them. The conclusion to screen out noise disturbance effects was agreed by Natural England in their RR **[RR-0761].** With respect to changes in water quality the piles associated with the solar panels are negligible in area, and of a reasonably shallow depth (1-3m as per Table 6.3 in ES Chapter 6 Project Description **[APP-043]**), and therefore unlikely to significantly impact ground water flows. During construction/installation appropriate industry standard site management will be undertaken to mitigate risk to ground water, as set out in the outline Code of Construction Practice (oCoCP) **[APP-232]**. The conclusions with respect to water quality within the HRAR **[APP-163]** have been agreed by Natural England in their RR **[RR-0761].**
Q1.12.2	Applicant Natural England	**Thresholds for assessment** 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. 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-	As set out in their RR **[RR-0761]**, Natural England have agreed the scope, methodology and conclusions of the HRAR **[APP-163]**. This specifically includes with respect to changes in air quality (in section 2). 1) The numbers set out in paragraph 4.4.10 of the HRAR are AADT movements, not individual vehicles. 2) No, the numbers are AADT movements not vehicle numbers and, as such, already account for two-way flows. 3) The in-combination AADT figures have been robustly calculated based upon recognised trip generation methodologies that assume worst-case assumptions for each project included. This already includes an element of precaution because although assessing a worst-case trip generation may be robust for considering each individual project, the in-combination trip generation of all projects calculated as such creates an unrealistically high AADT given that the worst-case is unlikely to occur for all projects. Furthermore, a precautionary approach has been taken to the build out of other projects such that the in-combination AADT is calculated on a precautionary basis. As such, the Applicant

ExQ1	Question to	Question	Applicant's Response
		vehicle threshold, and it would not take much change in future vehicle trips for that threshold to be exceeded?	is confident that these figures are already sufficiently precautionary that no further assessment is necessary.
Q1.12.3	Natural England	**Site Improvement Plans** 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?	
Q1.12.4	Applicant Natural England	**Unforeseen consequences** 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?	As set out in section 4.5.2 of the HRAR, there is no hydrological connection between the Project site (including the Evenlode Corridor) and Cothill Fen SAC. As such, it is not possible for the changes proposed to the Evenlode Corridor to change the hydrological regime of that SAC. As set out in section 7.2.4 of the Ecology Strategy for the Project in the oLEMP **[APP-235],** the intention with the new floodplain meadow along the River Evenlode is to restore this habitat in this location, i.e. to that which would have been present along the River Evenlode prior to the intensification of farming through the 19th and 20th century. As such, because this is restoration rather than creation, the resulting habitats and ecological function will complement that within the Oxford Meadows SAC, restoring the hydrology to what would have been present historically. Further, the hydrology of the Oxford Meadows SAC is driven by the flood cycles of the River Thames, not directly by that of the River Evenlode. Therefore, although the confluence of the Evenlode and Thames is south of Cassington, any minor changes in flow rate on the Evenlode (due to additional water retention within the flood meadows on the Project site, for example) would not materially change the flow of the Thames and hence the hydrology regime in the SAC.
Q1.12.5	Applicant Natural England	**Construction Noise** 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.	The thresholds set within Table 13.25 are worst-case assuming the use of large-scale piling rigs. It is highly unlikely that any such large-scale equipment would be necessary and therefore, these thresholds are highly precautionary. The closest piling associated with the Project would take place within fields to the north of Cassington and the A40 circa 1.2km from the Oxford Meadows SAC (the closest point of the Project to the SAC is the cable corridor rather than where any piling will occur). The impact of disturbance (including noise during construction from activities such as piling) is screened from further assessment in section 4.7.1 of the HRAR **[APP-163]** on the basis of the distance and that, given the distance

ExQ1	Question to	Question	Applicant's Response
		Explain the situation and whether the action of percussive piling would have any effect on wildlife interests in the study area.	and the noise/disturbance generated by the intervening villages/roads, there would be no greater effect than what is already generated by these roads and villages and would not add to these effects, but rather be imperceptible because of them. The conclusion to screen out noise disturbance effects was agreed by Natural England in their RR **[RR-0761].**

2.13 Q1.13 Health and Wellbeing

ExQ1	Question to	Question	Applicant's Response
Social health impacts			
Q1.13.1	Applicant	**Human Health Study Area** 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. Please explain the rationale as to why this ward was not included in the assessment.	We note the query as to whether Launton and Otmoor should be included in the Human Health study area. The OCC query on this matter (RR-0793-055) has been responded to in the Botley West Solar Farm Applicant Responses to Relevant Representations [REP1-020] response to RR-0793-055 (8.4) (pdf page 93 of 545). Additional points are set out below. Peridswell Farm and Shipton-on-Cherwell village, which are referenced by OCC, are within the parish of Shipton-on-Cherwell and Thrupp, which is within Launton and Otmoor ward. With regard to assessment, Chapter 16 **[APP-053]** section 16.9, specifically includes the communities of Shipton-on-Cherwell and Thrupp within the assessment, which are the relevant indicative communities in Launton and Otmoor ward. Detail on the analysis of these communities is set out in Appendix 16.4 Human Health PRoW Analysis [**APP-222**], see discussion of Shipton-on-Cherwell and Thrupp to Tackley (east) and Woodstock (south). Launton and Otmoor ward has therefore been appropriately taken into account by the assessment and the conclusions reached as to the likely significant population health effects.

ExQ1	Question to	Question	Applicant's Response
			With regard to study area, Chapter 16 **[APP-053]** page 23 includes a footnote (footnote 2) that states on this issue: "*Only a small area of Launton and Otmoor ward is affected by the project. Relevant baseline data for Woodstock and Bladon ward is considered sufficiently indicative of the part of the population of Launton and Otmoor ward that may be affected by the Project. High sensitivity is assumed for the vulnerable group population in the relevant part of Launton and Otmoor ward*." The implications of including Launton and Otmoor ward in the human health site-specific study area has been reviewed and it can be confirmed that the inclusion would not change the conclusions as to the likely significant effects for population health, including vulnerable groups. The human health site-study area defines an indicative population to determine the sensitivity of the population and is not used to set a hard limit on the extent of the affected population. Not including this ward within the human health site-specific study area does not exclude that population from having been taken into account in terms of impacts discussed and conclusions reached in Chapter 16 **[APP-053].** For avoidance of doubt Launton and Otmoor ward forms part of the human health local study area of the health assessment and therefore is not a gap in the assessment. For the human health assessment **[APP-053]** a 1km distance is not a parameter in determining a relevant population to determine sensitivity. The health assessment uses general proximity of communities and areas of higher deprivation to inform the professional judgement as to the most relevant wards. IEMA Guide: Effective Scoping of Human Health in Environmental Impact Assessment (2022) paragraph 7.4, (referenced by Human Health assessment **[APP-053]** in Section 16.4) confirms "*The smaller geographic scale (e.g. site specific population) may be defined conceptually, rather than with reference to hard administrative boundaries. An administrative boundary does not necessarily define the boundaries of potential mental and physical health effects*". In summary, Launton and Otmoor ward and its population have been appropriately taken into account by the health assessment **[APP-053]** even though the ward was not included within the site-specific study area used as a basis for determining population health sensitivity. Inclusion of the ward in this regard would not alter the health assessment conclusions.

ExQ1	Question to	Question	Applicant's Response
Q1.13.2	Applicant	**Impacts on schools and school children** 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: • Yarnton Preschool • William Fletcher Primary School • Cumnor C of E Primary School 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. 2) Additionally, please confirm whether educational establishments were specifically considered in noise, dust and EMF assessments? If not, please provide a detailed justification.	1) Children and young people are considered sensitive receptors in the Human Health assessment [**APP-053**]. This is not limited to their time at school. As set out in the IEMA Guide (2022) Effective Scoping of Human Health in Environmental Impact Assessment, paragraph 7.8 "*For health in EIA, population groups are the sensitive receptors, the health outcomes of which are considered*." The Human Health assessment [**APP-053**] identifies children and young people as relevant receptors throughout the assessment and assigns them high sensitivity (the highest level within the methodology). All school locations have therefore been considered as sensitive receptors due to the presence of children. Whilst it is confirmed that Yarnton Pre-School and William Fletcher Primary School in Yarnton and Cumnor C of E Primary School have been taken into account in reaching conclusions as to the likely significant population health effects; it is also noted that these are schools that are not in a proximity to the project boundary. Yarnton Pre-School is approximately 900m from the Order Limits and Cumnor C of E Primary School is approximately 600m from the Order Limits. These are distances at which project impacts (e.g. dust, noise, glare etc..) would be greatly reduced and are not considered to have the potential for significant public health effects, including for vulnerable groups such as children. In additional it is confirmed that other schools within 1km, such as Bladon C of E Primary School, Eynsham Primary School, LVS Oxford - Special Education School, The Marlbrorough C of E School (Woodstock), Woodstock C of E Primary School, and Wootton By Woodstock Primary School, have also similarly been taken into account by the assessment as children and young people are considered sensitive receptors, including but not limited to their time at school. All school locations have been considered as sensitive receptors due to the presence of children. 2) With regard to glint and glare impacts on school sites, this has been responded to in the Botley West Solar Farm Applicant Responses to Relevant Representations **[REP1-020]** response to RR-0793-065 (pdf page 129 of 545). The response confirms "Yarnton Preschool, William Fletcher Primary School, and Cumnor C of E Primary School alongside the geometric modelling and it can be determined that no impacts are predicted towards these schools." The response also confirms that commercial and educational establishments are not typically considered within standard methodology, as these locations are not permanently inhabited and are considered to have lower amenity sensitivity than residential receptors. Notwithstanding this point, we note that OCC Property query included the importance of ensuring that "*playing areas for the primary schools and preschool*

ExQ1	Question to	Question	Applicant's Response
			will remain a safe space for the children". Appendix 4.4 Glint and Glare Study [**APP-128**] quotes EN-3 paragraph 2.10.102 in noting that "solar panels are specifically designed to absorb, not reflect, irradiation", with a footnote that "*Most commercially available solar panels are designed with anti-reflective glass or are produced with anti-reflective coating and have a reflective capacity that is generally equal to or less hazardous than other objects typically found in the outdoor environment, such as bodies of water or glass buildings*." Appendix 4.4 Glint and Glare Study [**APP-128**] provides a table on pdf page 123 of 262 that illustrates that the reflection from solar panels is likely to be similar to that from water (5% of light reflected), and much lower than that from snow (80% of light reflected). From a public health perspective, such information indicates that solar panel reflections do not constitute a particular safety risk. It is noted by contrast that in the scientific literature solar thermal power stations that are based on a principle of reflecting and concentrating solar rays to a particular point are potentially a safety risk. However, such solar facilities are fundamentally different from the proposed development. Example sources of concentrating solar power plant literature include: *Rascón, et al., Ocular risks assessment in a central receiver solar power facility based on measured data of direct solar radiation, Solar Energy, Volume 164, 2018, Pages 77-88, ISSN 0038-092X*. This point is included as a clarification as there can be community concern around such issues, which may arise from information based on such collector technologies rather than the absorption technologies of this project. Whilst glint and glare findings have not specifically been referenced within the Human Health assessment **[APP-053],** the inclusion of Appendix 4.4 Glint and Glare Study [**APP-128**], and its clarification in the Botley West Solar Farm Applicant Responses to Relevant Representations [REP1-020] response to RR-0793-065 (pdf page 129 of 545), would not alter the overall conclusions as to the likely significant population health effects of the Project. With regard to noise and vibration impacts on school sites, this has been responded to in the Botley West Solar Farm Applicant Responses to Relevant Representations [REP1-020] response to RR-0793-066 (pdf page 129-130 pf 545). This confirms that relevant educational establishments have been considered.

ExQ1	Question to	Question	Applicant's Response
			ES Chapter 19 Air Quality [**APP-056**] discusses dust effects including in relation to schools. With regards to electromagnetic fields (EMF), the Botley West Solar Farm Applicant Responses to Relevant Representations [REP1-020] response to 'EMF risks' (pdf page 78 of 545) confirms that no significant effects to public health would be expected to arise from the Project. Whilst not explicitly referencing schools this conclusion is relevant to all places where people spend extended periods of time. ES Chapter 16 **[APP-053]**, discusses the Government Voluntary Code of Practice (Department for Energy Security & Net Zero, 2012), which at a page 4 of that publication notes that limit values predominantly relate to residential dwellings, but that that it is prudent to take a precautionary approach and also apply the relevant thresholds to "include non-residential uses such as schools, crèches and day nurseries". The Projects commitment to compliance with this voluntary code (Chapter 16 [**APP-053]** Table 16.23 commitment number 16.7) therefore means that by design the EMF considerations have been related appropriately to schools.
Q1.13.3	Applicant	**Climate change and adaptation** 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. Please clarify whether this is an error in Table 1-5 [APP-219].	In relation to human health the construction and operational phases are not generating electricity, so the public health benefit is not relevant outside of the operational phase. The scale of adverse health effect from embodied carbon and climate alerting pollutant emissions in the construction and decommissioning phases is not of a scale that could significantly affect public health and has therefore been scoped out. This is set out in Scoping Report **[APP-125]** Table 7.19 (pdf page 116 of 169) and was not disagreed with in the Scoping Opinion [**APP-126**] section 3.10 (albeit no specific discussion is provided).
Q1.13.4	Applicant	**Community food growing areas** 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. Given the	The Applicant has signed a memorandum of understanding with two groups to operate on the land set aside for community food growing and is actively seeking more. The Cherwell Collective is a social enterprise working to support those in food poverty, connect people isolated in the community and reduce food waste and co2 emissions. They will establish food forests on the project site, a type of allotment. These enable those they support to learn how to grow their own food, get out of the house into the countryside, learn how to recover degraded land and make it productive without using chemical inputs – they call it permaculture. A Collective staff member teaches skills and supervises activities. The Collective has

ExQ1	Question to	Question	Applicant's Response
		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.	clients in the villages adjacent to the Project site and will establish food forests nearby to avoid car journeys. The Collective call this Harvest @ Home; they partner with schools to teach food-growing skills. Surplus food is shared with their community. The second group is run by Chris Goodall. He will establish a food growing enterprise run by a professional market gardener with volunteers providing the labour. He already does this at the Cutteslowe allotments in North Oxford. The food produced will be given to local food banks such as the Cutteslowe Larder to support those in food poverty. Both sites will be open for school visits, as will the solar site.
Q1.13.5	Applicant	**Cycle route connectivity** 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. 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.	The Applicant has been in discussions with OCC as highway authority, and with the PRoW officer, about the opportunity to create new cycle provision within the Project, between Bladon and Campsfield and at Sansom's Farm. These discussions are in progress, and the degree to which off-site improvements, to be delivered by the highway authority, and funding for those remains to be resolved. The Applicant has also made provision, within the scheme, to help facilitate the Salt Cross to Hanborough Station active travel route, but that would be delivered by other parties, in association with the Salt Cross development.
Q1.13.6	Applicant	**Cumulative effects assessment – open space, leisure and play** 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.	We can confirm that there is an erratum and that the second 'not' should be deleted. A double negative was not intended. Corrected text is provided below: "It is not considered that the activities of cumulative schemes or additional populations associated with cumulative schemes would ~~not~~ result in new or materially different population health effects conclusions to those reached for the Project in isolation in section 16.9, Open space, leisure and play."
Q1.13.7	Oxfordshire County Council	**Health Impact Assessment** 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	Whilst this query is directed to OCC, we note their RR-0793, Section 8 (Public Health) statement in relation to Chapter 16: Human Health [APP-053]: "*The human health assessment chapter provides an alternative to a standalone Health Impact Assessment, but providing the content is sufficiently comprehensive, this is an acceptable method of analysing the health impacts of the proposals and the mitigations required to reduce these*."

2.14 Q1.14 Landscape Resource and Visual Amenity

ExQ1	Question to	Question	Applicant's Response
Landscape and Visual Errata and Methodology			
Q1.14.1	Applicant	**Photomontages [APP-079] - errata** Please see question 1.6.2. Also relevant to this section.	Please refer to response to Question 1.6.2 above.
Q1.14.2	Applicant	**Landscape and Visual Impact Assessment (LVIA) [PDB-006] - errata** 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. • 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. Please check Figure references throughout this document and also ensure figures are correctly labelled.	At paragraph 8.6.7 of the LVIA **[APP-045]** 'Figure 8.128' should read: 'Figure 8.244' (National Landscape Character Areas **[APP-068]**); At paragraph 8.6.8 of the LVIA 'Figure 8.129' should read 'Figure 8.245 (Regional Landscape Character **[APP-069]**); At paragraph 8.6.10 of the LVIA 'Figure 8.131' should read 'Figure 8.247' (District Landscape Character Areas (including ZTV) **[APP-071]**); At paragraph 8.6.12 Figure '8.128' should read 'Figure 8.244' and 'Figure 8.130'; 'Figure 8.129' should read 'Figure 8.245' and 'Figure 130' should read 'Figure 8.246' (Local Landscape Character Areas **[APP-070]**). Additional paragraph 8.6.12 should make reference to 'Figure 8.247 (District Landscape Character Areas (including ZTV) **[APP-071]**). Paragraph 8.6.12 in referring to landscape character figures, no reference to Representative Viewpoints is required. At paragraph 8.6.17 'Figure 8.130' should read 'Figure 8.246' (Local Landscape Character Areas **[APP-070]**).
Q1.14.3	Applicant	**Views from Outdoor Recreational Facilities - errata** 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.	As a matter of clarification, the paragraphs being referred to in Q1.14.3 should read 8.6.66 to 8.6.69. In respect of recreational facilities, it is acknowledged that there is missing reference(s) to recreational facilities which fall within the ZTV of the Project. This is an error and should have formed part of the baseline within the LVIA **[APP-045]**.

ExQ1	Question to	Question	Applicant's Response
			Those recreational facilities which fall within the ZTV of the Project, and should have been referred to, include: • Bladon play area and recreation ground; • Begbroke play area and recreation ground (part); • Cassington recreation ground; • Worton Park; • Eynsham recreation ground (part); • Freeland recreation ground (part); and, • Long Hanborough play area and recreational ground; Due to the low-lying nature of the Proposed Development, distance and intervening vegetation, there is little potential for the proposed solar arrays and / or substation(s) to have a significant visual effect upon the above recreational resources and therefore they were not considered further within the LVIA **[APP-045]**. However, they should have been included as part of the baseline review process.
Q1.14.4	Applicant	**Residential Visual Amenity Assessment (RVAA)** 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. Provide a more in-depth assessment in accordance with TGN 2/19, including; • Step 1 – Define the study area and identify the properties to be assessed; • Step 2 – Evaluate the baseline visual amenity of these properties;	Professional judgement and applicable guidance was used to determine a minimum 25 m buffer zone, from individual properties and settlements, and this has been incorporated into the Project design to soften viewpoints and minimise any likely effects. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which would further limit the effects of the Project. Additional mitigation, as shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**, was included to further screen available views from residential properties. Due to the low level of the Project and proposed mitigation, it is anticipated that there is no potential for any private views to be adversely affected to an extent that would result in a level of effect, which would trigger the requirement for RVAA. The impact of Glint and Glare upon residential amenity has been assessed within the Solar Photovoltaic Glint and Glare Study **[APP-128]** (Section 7.4).

ExQ1	Question to	Question	Applicant's Response
		• Step 3 – Assess the likely change to this baseline and identify of which properties requiring further assessment; • 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.	The Glint and Glare report identified a moderate impact upon residential amenity for seven dwellings for which mitigation was recommended. This recommendation was looked at and changes made to the design as required. These recommendations can be revisited to ensure that all have been considered properly, and any further mitigation can be added as necessary.
Q1.14.5	Applicant	**Methodology relating to duration and reversibility** [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. Neither duration nor reversibility parameters are assessed or justified in the LVIA. In light of the wording of GLIVIA and the consideration of reversibility within, for example, a generation, justify your reasonings for considering the Project fully reversible.	Reversibility and duration are factors to be considered when evaluating the magnitude of impact of any given development. They are not subject to separate assessments. Paragraph 5.48 of GLVIA3 states that *"Each effect on landscape receptors needs to be assessed in terms of its size or scale, the geographical extent of the area influenced, and its duration and reversibility"*. *The magnitude of change is stated as combining consideration of the scale or size of effect with the extent of the area affected and duration / reversibility of that effect*. (GLVIA3, para 3.24). The relative weighting of the three main factors is not specifically discussed in the GLVIA3. Practitioners use different approaches depending on the type of development. One approach gives most weight to the scale of effect and extent (in terms of distance), therefore considering that the magnitude of change is at the same level as the scale of effect and duration and reversibility are stated separately. This LVIA Methodology approach applies equal or almost equal weight to these factors (scale, duration, reversibility), which define the magnitude. Therefore, the overall magnitude of change is less than the scale of effect alone. For the study of a development of this nature, which is low-lying, with extremely limited visual influence within the 5 km study area, where most of the representative viewpoints are located in immediate proximity to the site, and taking account of the site' inherent quality of mitigation, then this approach was considered sensible and more proportionate. Para 8.5.9 LVIA states that for the purposes of this assessment, the Project is considered to be fully reversible. This does not mean that baseline views will be restored, but any physical harm attributable to the Proposed Development can be rectified. The introduced mitigation planting, apart from providing the screening effect and helping the landscape to absorb the Proposed Development, would

ExQ1	Question to	Question	Applicant's Response
			provide large-scale biodiversity enhancement. Therefore, these mitigation effects are, by nature, beneficial and will balance the adverse effects attributable to energy infrastructure elements. The proposed vegetation would be retained after the removal of the infrastructure elements and will continue to provide a positive permanent contribution to the landscape. On decommissioning/reversibility NPS EN-3, paragraph 2.10.68, notes that *"solar panels can be decommissioned relatively easily and cheaply" … "Generally it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue* Paragraph 2.8.352 of NPS EN3 states that *"Where adverse effects are anticipated either during the construction or operational phases, in coming to a judgement the Secretary of State should consider the extent to which the effects are temporary or reversible"*. NPS EN3 further states that *"Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed" (para*graph 2.10.66). Consent for the Botley West Solar Farm Project is being sought for a 42-year period (paragraph 6.5.1 of Chapter 6: Project Description **[APP-043]**). The Project is therefore considered temporary, in national policy terms, and therefore reversible. The Landscape, Ecology and Amenities Plan **[APP-228]** illustrates what the Site might look like after the solar arrays and other infrastructure are removed, as part of the landscape legacy for the Project. The Landscape and Visual Assessment **[APP-045]** sets out duration and reversibility of effects. Reversibility is described as "a judgement about the prospects and practicality of the particular effect being reversed in, for example, a generation" (GLVIA, para 5.52). For the purposes of the assessment, the Project is considered fully reversible due to the duration of effects.
Q1.14.6	All local authorities	**Viewpoints and Photomontages** 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	It should be clarified that although the assessment of landscape and visual effects is supported by the representative viewpoints alongside the visualisations, the assessment conclusions are not based only on the viewpoints themselves.

ExQ1	Question to	Question	Applicant's Response
		views that you feel are important, or if already provided at DL1, please signpost these.	
Q1.14.7	Applicant	**Scope of assessment** 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. 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.	As shown on Figure 1.7 of ES Appendix 9.13 Biodiversity Net Gain Assessment **[APP-162]**, the BNG calculation for the area of the substations in the Southern Site Area assumed both would be hardstanding. As such, no correction to the BNG calculation is required. However, a revised Landscape, Ecology and Amenities Plan has been submitted at Deadline 2 **[EN010147/APP/7.3.3 Rev 2]** to ensure this correctly reflects the land use in this area.
Q1.14.8	Applicant	**Lighting** 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.	There is no permanent lighting proposed as part of the Project. Details of lighting proposed are shown within Section 6.4 (Table 6.4) of ES Chapter 6: Project Description **[APP-043]**. There would be no lighting required within the solar array areas, the largest element of the Project. The substation(s) will be unmanned with no permanent lighting required. Lighting for Solar PV Array and Transformers would be a combination of manually operated lighting and PIR motion sensor activated security / emergency lighting. No lights will be permanently switched on. Operated manually. Substation(s) would be a combination of manually operated lighting and passive infra-red (PIR) motion sensor activated security / emergency lighting. No lights permanently switched on. Should maintenance access / works be required during the hours of darkness, any lighting used for this purpose would be temporary in nature. With lighting focussed inwards to minimise light spill, in accordance with a sensitive lighting strategy to minimise the impacts of lighting, implemented as outlined in the Outline Code of Construction Practice (OCoCP) **[APP-232-233]**.

ExQ1	Question to	Question	Applicant's Response
Q1.14.9	Applicant	**Suggested areas to be omitted from the Proposed Development** 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. Provide a plan with all these omissions shown as overlays, with each layer being identified with the name of the proposer. This plan should include the suggestions from: • ICOMOS • Historic England • The local authorities • Oxford Airport	The Applicant has submitted a Change Request 2 notification alongside this Deadline 2 which intends to capture certain scheme refinements and Order limits reductions in response to various feedback from interested parties. This includes areas where the Applicant is proposing to omit areas of solar installation. Full copies of application documents impacted by the proposed changes as flagged in the change request notification will be submitted alongside the formal Change Application.
Q1.14.10	Applicant	**Levels of Significance in LVIA Methodology** 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. 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. 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. 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	It is the Applicant's position that the methodology used to assess the landscape and visual effects, of the Botley West Solar Farm Project, follows best practice guidance. When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. Paragraph 3.32 of GLVIA3 explains that there are no hard or fast rules about what effects should be deemed to be significant. The assessment within Chapter 8: Landscape and Visual Impact Assessment [APP-045] are influenced by the proportionality principle expressed in paragraph 1.17 of GLVIA3 *"identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that assessment should be tailored to the particular circumstances in each case."* For the purposes of the Botley West Solar Farm Project, those effects of Moderate adverse or below are considered to be not significant. LI TGN-2024-01 further clarifies this statement *"…if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in*

ExQ1	Question to	Question	Applicant's Response
		applicant's position as to why it has deemed a moderate effect not to be significant.	*the methodology or receptor assessment as to whether a moderate effect is significant or not."* (Issue / Question 3(5), Page 8). As the LVIA deals with perceptual qualities, which are not explicitly measurable and the scale of ratings is limited, then there are cases where the perception of the effects attributable to the development, which, due to the scale factor, are closer to medium than to low effect. Due to other factors the perceivable appearance of the development resulting in Moderate level of effect upon high sensitive receptor would not constitute significant effect. For example, the solar farm would be visible on several fields, being therefore widely visible; however, its close-range visibility is limited. As the development is low-lying, the resulting change in views within a wider scale landscape, or due to the existing vegetation pattern, is considered of Medium magnitude and not significant. In the case of this Project, most of the visibility is from PRoWs, which represent transient, varying views. It is expected that there could be different approaches and perceptions, and in this case, as all the receptors are in close proximity, or even in the midst of the site, then even if considering the results as a significant level of effects, then these can all be mitigated through the proposed Mitigation Proposal. Every development needs to be assessed on a case-by-case basis. With the assessment of effects being a matter of subjectivity and professional judgement of the respective authors. When considering the landscape effects, of the Project, it is acknowledged that there would be an effect, significant or not, on the Project Site itself with it turning from that of agricultural fields to one of a solar farm development. Which is true of all developments in countryside. However, all existing hedgerows, trees and woodland would be retained as part of the Project. With the exception of some small areas of hedgerow to be removed. As identified on the Hedgerow Removal Plans Rev 1 **[AS-007]**. As such the inherent landscape characteristics and physical framework of the landscape would be retained. The LVIA **[APP-045]** also considers the landscape character areas (LCAs) / landscape character types (LCTs) as a whole. As such, only a small part of the LCA / LCT may be directly impacted by the Project. This would dilute the LCAs overall susceptibility to the Project and reduce the overall magnitude of effect. Of the project examples cited within Question 1.14.10, it is noted that Little Crow Solar Farm, for example, identified by OCC, is located within two small landscape character areas and would therefore have a greater impact. It is also noted that assessment of effects upon landscape

ExQ1	Question to	Question	Applicant's Response
			character, while stated as Major, is identified as within the order limits and immediate environs only, with no reference to the wider LCA. Which demonstrates the subjectivity and different approaches to any given assessment. When considering visual effects, the Botley West Solar Project is spread over a large area, with multiple visual receptors with varying visibility of the Project. There is no part of the landscape from where the Project as a whole would be visible. As such, visual effects would be as a result of a small proportion of the overall Project from any on Representative Viewpoint. When considering views as a whole, it has to be considered whether the addition of the Project would alter available views to such an extent as to be significant. Or whether the overall composition of the view is retained. In middle or long distance views, with the Project following the existing contours and much of it at 2.30 m in height, it was judged that views would largely be retained. Within closer views, particularly from public rights of way passing through the Project Site, it has been acknowledged within the LVIA **[APP-045]** that the Project would result in a number of significant effects.
Landscape Effects			
Q1.14.11	Applicant	**Landscape effects - Construction** 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. According to the definition of significance of effects matrix at Table 8.13, a minor effect is described as "Where proposed changes would be at slight variance with the character of an area." 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. Explain in more detail how the assessment of minor adverse effect is justified, particularly in relation to the how the scale of construction	The construction period for the Botley West Solar Farm is expected to last approximately 24 months. As a result, different parts of the respective landscape character areas, within which the Project is located, would be affected sequentially, at different times, and not concurrently. Para 8.9.7 provides that the Project Site of a Medium to High sensitivity would experience a Medium magnitude of change at construction that would result in Moderate adverse significance of effect, which is not significant. This considers the limited physical intrusion on the surface of the landscape fabric. All structural landscape elements, such as existing hedgerows, trees and woodland, would be retained as part of the Project. With the exception of some small areas of hedgerow to be removed. As identified on the Hedgerow Removal Plans Rev 1 [**AS-007**]. As such, the inherent landscape characteristics and physical framework of the landscape would be retained. Para 8.9.8 provides that overall, when considering the landscape character areas as a whole, the magnitude of the impact is considered to be Low, and the sensitivity of the receptors is Medium to High. The effect will, therefore, be of Minor adverse significance, which is not significant. The LVIA **[APP-045]** considers the landscape character areas (LCAs) / landscape character types (LCTs) as a whole due to their overlapping characteristics within

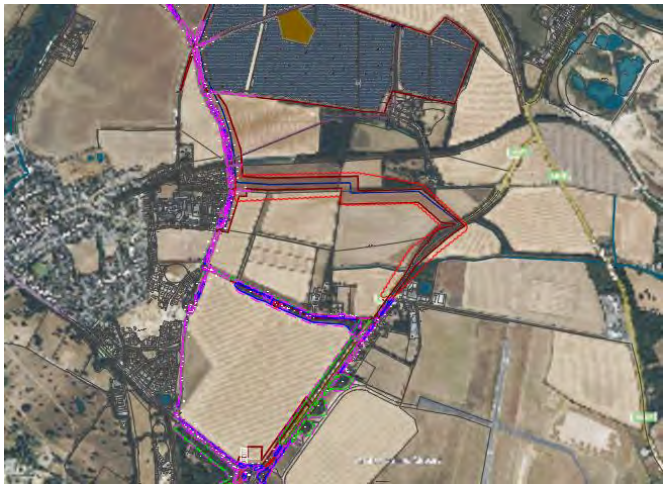
ExQ1	Question to	Question	Applicant's Response
		across the proposed development site may be considered as only a "slight variance" with the existing character.	the project area. As such, only a limited area of the LCA / LCT would be directly/ physically impacted by the Project. In conclusion the overall effect on the landscape fabric within the wider landscape character area is considered Minor.
Q1.14.12	Applicant	**Landscape Effects – Operation** 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. According to the definition of significance of effects matrix at Table 8.13, a moderate effect is described as "Where proposed changes would be noticeably out of scale or at odds with the character of an area" and a minor effect is described as "Where proposed changes would be at slight variance with the character of an area." 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. 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.	When considering the landscape effects of the Botley West Solar Farm Project, all existing hedgerows, trees and woodland would be retained as part of the Project. With the exception of some small areas of hedgerow to be removed. As identified on the Hedgerow Removal Plans Rev 1 **[AS-007]**. As such the inherent landscape characteristics and physical framework of the landscape would be retained. The low-lying nature of the Project, the retention of the main structural landscape elements, and the large scale of the agricultural fields, ascertain that although the change within the landscape would be noticeable, this would not be out of scale or at odds with the character of the area. The perceivable effects would be on a limited scale and to a limited extent. The perceivable scale of the proposed development would not take over the existing landscape elements or the skyline. The LVIA **[APP-045]** has considered the landscape effects of the Project Site, identifying a Moderate adverse landscape effect and the wider landscape character area(s) within which the Project is located. As stated, in the response to Question 1.14.11, when considering the landscape character areas (LCA), the LVIA considers the LCA as a whole, which in the case of LCA 4: Eastern Parks and Valleys for example is a large LCA, a small part of which is occupied by the Project. As a consequence, in combination with the retention of physical landscape characteristic detailed above, a significance of effect of Minor adverse upon the LCA as a whole is considered appropriate.
Visual Effects			
Q1.14.13	Applicant	**Residential Properties** 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. Under Section 9, - Assessment of Effects, there is no reference to this Key Receptor group. Please update this	Paragraph 8.6.78 to 8.6.80 deals with 'Private Views' and gives clarification as to why private views have not been included within the assessment of effects (Section 9) of the LVIA **[APP-045]**. LI TGN-2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3), provides further guidance on this matter. Stating that *"Views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that*

ExQ1	Question to	Question	Applicant's Response
		document with the required assessment. See also Q.1.14.4 regarding RVAA.	*there is no right to a view. However, it may be helpful for an LVIA to comment on changes to views that will be experienced from groups of properties..."* (Question 6(1), page 15). The LVIA **[APP-045]** has included reference to settlements, and they are included as part of the overall assessment of effects. Please also refer to response to Q1.14.4 regarding RVAA.
Q1.14.14	Applicant	**Visual effects - Construction** Table 8.18 identifies the key visual receptors taken forward into the assessment with most being high sensitivity. 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. According to the definition of significance of effects matrix at Table 8.13, a moderate effect is described as "Where proposed changes to views would be noticeably out of scale or at odds with the existing view." and a minor effect is described as "Where proposed changes to views, although discernible, would only be at slight variance with the existing view" 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.	Please refer to response to Question 1.14.10.
Q1.14.15	Applicant	**Visual Effects – Operation** 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	Please refer to response to Question 1.14.10.

ExQ1	Question to	Question	Applicant's Response
		major adverse effect is concluded but this is still considered not significant. According to the definition of significance of effects matrix at Table 8.13, a moderate effect is described as "Where proposed changes to views would be noticeably out of scale or at odds with the existing view." and a minor effect is described as "Where proposed changes to views, although discernible, would only be at slight variance with the existing view" 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.	
Q1.14.16	Applicant	**Retention of hedgerows following decommissioning** 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. The applicant responded that the hedgerows, as well as other planting would remain as a "landscape legacy" and would not be removed at decommissioning. 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. Provide details on how this potential conflict could be managed.	Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape, such as much of Dornford Lane (PRoW 416/11/30) which oases through the middle of the northern section of the Project. Proposed mitigation would be retained, post decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the

ExQ1	Question to	Question	Applicant's Response
			undulating nature of topography and suitable widths for PRoW corridors, it is anticipated that views to the wider landscape and key features such as church spires would remain visible and available to users. The retention of proposed mitigation, designed in as part of the Project, would enhance the key characteristics of host landscape character areas and be in line with recommended guidelines and enhancements priorities. For example, LCA 4: Estate Parks and Farmlands, which covers much of the northern section of the Project, has the following priorities which the Project is taking account of and reinforcing: • *retain mature boundary and roadside trees and replant as necessary;* • *manage and extend existing areas of woodland to maximise their wildlife and landscape value;* • *plant new blocks and belts of broadleaved woodland within estate farmland to reinforce typically enclosed, well-wooded character.* (Page 35, West Oxfordshire Landscape Assessment 1998) Within the LVIA, the mitigation proposed as part of the Project would not alter the baseline view(s) as the planting would form part of a future baseline scenario. Planting that would alter the baseline views, particularly at Year 15, but also forms part of a baseline scenario are large areas of woodland planting being undertaken and in some cases planting within parts of the Blenheim Estate, in proximity to the Project. Areas of new woodland are shown on the Illustrative Masterplan **[APP-062]** and can be seen in many of the baseline views, such as Representative Viewpoint 10 **[APP-065 and 066]**. Where visible, the new woodland has been factored into the LVIA assessment of effects and it has been assumed that, like the proposed mitigation, this woodland would be established at summer Year 15 and so further minimise potential effects.
Q1.14.17	Applicant	**Arboricultural Report Update** 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	Please see Appendix 6 of this document and map extracts below. The two cable route areas which were inaccessible at the time of the fresh tree surveys were: - Land west of Upper Campsfield Road, centred on https://w3w.co/height.udder.cocoons

consider whether these assessments are required.



- and - Land north east of Siemens at Swinford Bridge, centred on https://w3w.co/fishery.snippets.bystander

2.15 Q1.15 Noise and Vibration

ExQ1	Question to	Question	Applicant's Response
Noise Effects			
Q1.15.1	All Local Authorities	**Local Authority views on applicant's assessment and conclusion** 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". 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.	
Q1.15.2	Applicant	**Derivation of operational noise model output figures** 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.	The figures specified in Annex B of Appendix 13.3 Operational Phase Noise **[APP-213]** have been derived using the methodology defined in *British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound* (BS4142). This technical guidance defines the procedure to determine the impact of commercial and industrial sound on residential receptors. As part of this procedure, there is a requirement to compare the existing background sound level (without the development) against the calculated sound level from the development (Rating Level). A negative difference will be found where the Rating Level is less than the Background Sound Level.
Q1.15.3	Applicant	**Noise nuisance level calculations/ assumptions** 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.	As is defined in *British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound* (BS4142), where the exceedance of the Rating Sound Level above the Background Sound Level is around 5dB, then an adverse noise effect may be experienced. The operational phase noise level (Rating Sound Level) is found to be up to 2dB above the background sound level at Jumpers Farm. Therefore, an adverse noise effect will be avoided.
Q1.15.4	Applicant	**Exceedance of set noise limits**	This procedure can be included into the 7.6.2 - Outline Operational Management Plan **[APP-234].**

ExQ1	Question to	Question	Applicant's Response
		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.	
Q1.15.5	Applicant	**Noise reflection** 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?	The effect of the reflection of noise from solar panels is not well understood, and difficult to quantify. Furthermore, the solar panels will be positioned at an angle to ensure that maximum energy is absorbed from the sun. Therefore, it is very unlikely that the solar panels will reflect sound from any ground-based noise sources. It is possible for some sound from an overflying aircraft to occur. However, the alignment between the aircraft, solar panel, and receptor would occur for a very brief time period, as the aircraft moves forward, and would not cause a marked increase in the noise impact from aircraft at receptors.
Q1.15.6	Applicant	**Noise nuisance and distance** 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.	The operational phase assessment shown in Appendix 13.3 Operational Phase Noise **[APP-213]** uses the methodology defined in *British Standard 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound* (BS4142). This technical guidance defines the procedure to determine the impact of commercial and industrial sound on residential receptors. BS4142 determines an assessment criteria for residential receptors, and this criteria has been used to define the potential adverse noise effect on residential receptors. The assessment of noise has utilised the three-dimensional computational noise modelling software SoundPLAN. The noise emission levels for each item of plant have been input into this noise modelling software, along with the locations of the residential receptors. The noise model provides a calculated sound level at each receptor (Specific/Rating Sound Level). This Rating Sound Level has been compared against the existing Background Sound Level. Where the difference between the Rating Sound Level and the Background Sound Level is less than 5dB, then an adverse noise effect is avoided.
Q1.15.7	Applicant	**Missing data** There appears to be limited data entries in Table 13.21 [APP-050] in respect of ST1, ST2 and ST3.	These noise monitoring points were undertaken in locations where a secure location was not available, but that noise measurements were desired. As such, only short-term noise monitoring could be undertaken due to the risk of the high

ExQ1	Question to	Question	Applicant's Response
		Why were these locations only chosen for short-term monitoring, and with whom was the timing of the monitoring agreed?	value equipment being stolen or tampered with. This is standard practice where a secure location is not available. This approach was not agreed with an LPA as responses from Authorities were not forthcoming.
Q1.15.8	Applicant	**Exposure to noise** 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.	The exact construction methodology has not yet been defined. However, as was discussed in the ISH1, the 'piling' for the solar panel stations is akin to a machine to install fence posts, as opposed to those used for substantial buildings. Subsequently, the solar pile driving machine is likely to be able to install a large number of stanchions per day. As a result, it is likely that residents would only experience a slightly elevated sound level for no more than a day or so.
Q1.15.9	Applicant	**Links and noise** 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.	The construction vehicle noise impact assessment is shown in Table B1 - Appendix 13.2 Construction Phase Noise and Vibration **[APP-212].** This assessment calculates the increase in sound level from each of the 25-road links which could be affected by the development. The calculation considers noise from all vehicles (e.g. cars, vans, LVs, and HGVs). For Link 21, it is noted that there are 91 existing HGVs, and 105 development HGVs. However, the vast majority of the noise from the road will be from the existing combined 3,360 vehicles. As a result, the additional 105 HGVs presents a small increase in vehicle movements on Cunmor Road. Therefore, only a small noise increase would be experienced.
Q1.15.10	Applicant	**Outside of construction hours** Embedded mitigation measure 13.2 in table 13.24 of ES Chapter 13 [APP-050], states '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.' Has the Applicant considered the following: 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	It is possible that Horizontal Direction Drilling (HDD) works may continue outside of the defined construction hours. The assessment of construction phase noise at receptors for HDD works Appendix 13.2 Construction Phase Noise and Vibration **[APP-212]** considers night-time working. For any other works which may be required to continue outside of the core working hours, we would anticipate having to undertake a separate Section 61 application.

ExQ1	Question to	Question	Applicant's Response
		approval of this from relevant authorities and how would this process be secured in the dDCO?	
Q1.15.11	**Vibration Effects**	There are no questions on this topic at this time. Questions may be asked in future Hearings or in further written questions.	

2.16 Q1.16 Socio-economic Effects

ExQ1	Question to	Question	Applicant's Response
Socio-economic Impacts			
Q1.16.1	Applicant	**Tourism and recreation employment** What percentage of employment relates to the tourism and recreation sector in the Study Area?	Across "I: Accommodation and food service activities" and "R : Arts, entertainment and recreation" there is a total of 37,250. The total Study Area has circa 388,065 employees (BRES, 2022). Therefore the tourism and recreational sector employment rate is circa 9.6%.
Q1.16.2	Applicant	**Assessment and census data** 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. 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?	The SEIA chapter readily uses 2021 Census data, it has only used 2011 census data for the 'Travel to Work Area' boundary analysis which are derived from commuting inflows. The economic analysis uses the most up to date data.
Q1.16.3	Applicant	**Net direct construction employment** 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". At paragraph 15.9.48 this figure is	The net construction employment figure associated with construction is 199 FTE jobs. As the ExA has stated, there is a 8 FTE loss associated with Agricultural Labour. In paragraph 15.9.50 we calculate this economic loss associated with Agricultural Labour temporary cessation.

ExQ1	Question to	Question	Applicant's Response
		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?	
Q1.16.4	Applicant	**Net direct operation and maintenance employment** 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.	Again the GVA is calculated before losses and after losses. Paragraph 15.9.29 shows "the operational and maintenance stage would result in the creation of approximately 20 direct local FTE jobs in the local economy". Para 15.9.58 calculate the economic output losses associated with agricultural temporary cessation during the operation phase.
Q1.16.5	Applicant	**Real term economic output** 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?	Yes, this is £64.7 million
Q1.16.6	Applicant	**Improved skills and qualifications** 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. Will this information be made available before the close the Examination?	An Outline, Supply Chain, Skills and Employment Plan has been created which detail the skills and qualification opportunities associated with the development.
Q1.16.7	Applicant	**Blenheim Palace** 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.	A Heritage Impact Assessment (Volume 3 Appendix 7.4 of the ES **[EN010147/APP/6.5])** has been undertaken to review the potential for the Project to harm the significance of Blenheim Palace as a World Heritage Site (WHS). This has found that the construction, and decommissioning of the proposed Botley West Solar Farm would result in a minor negative impact on one of the defined attributes which contribute towards the Outstanding

ExQ1	Question to	Question	Applicant's Response
			Universal Value of the WHS. This impact arises from the visual change within the 'traditional English countryside' which forms the setting of the Blenheim Palace WHS. This change is time-limited and fully reversible, and in terms of Government policy the change is regarded as temporary. This time-limited and fully reversible impact should be considered alongside the benefits of the Botley West Solar Farm. These include direct benefits to the Blenheim Palace WHS in terms of long-term revenue for the maintenance of the World Heritage property.
Q1.16.8	Applicant	**Community food growing areas** 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. How is the delivery of this community initiative to be secured and what scale of food production is anticipated to be provided. 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.	The Applicant consulted on the proposals at the Statutory Consultation and engaged in direct discussions with potential food growers throughout the pre-application period. It was decided to place the areas close to settlements to reduce vehicle movements and to make access easy for villagers. The village of Bladon expressed interest in establishing an area for allotments, given current high demand and limited availability in the village. Cherwell Collective will start with five food forests and expects to build the operation from that base. Chris Goodall will take a three hectare area for production and expects demand from food banks to enable him to expand over time. Discussions were held with Good Food Oxfordshire, who run the OxFarmtoFork initiative. A tour of the site for food producers was organised on 20th June 2024 and a group looked at the areas set aside and took samples of the soil. All use agroecological methods and sell their produce directly to the Oxford Colleges. These growers will operate at larger scale than Cherwell Collective and Chris Goodall. The Applicant will fill all 30 hectares with food producers and expects this to have a significant effect on the volume of food the OxFarmtoFork system is able to deliver. Given the number of lives this could touch the Applicant would give this initiative moderate positive weight.
Q1.16.9	Applicant	**Community food growing areas** 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. Please confirm whether it is intended to work towards draft agricultural licence	The Applicant has signed Memoranda of Understanding with Cherwell Collective and Chris Goodall to operate in the areas set aside for food growing. Both will sign licences should consent for the Project be granted. OxFarmtoFork producers agreed that they would agree licences post-consent.

ExQ1	Question to	Question	Applicant's Response
		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.	
Q1.16.10	Applicant	**Outline Skills and Employment Plan - engagement** 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 "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…". Please provide an update in terms of the summary of engagement to date (section 7.5 of the OSEP).	Upon submission the most up to date Stakeholder Engagement was included.
Q1.16.11	Applicant	**Outline Skills and Employment Plan – GVA** 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. Please confirm which figure is correct and make amendments to any submitted application documentation if necessary.	The OSEP focus is solely on construction employment therefore does not include any net deductions from agricultural employment temporary loss. However the SEIA includes net deductions. Therefore both figures are correct in terms of their intended use.
Q1.16.12	Applicant	**Outline Skills and Employment Plan – agricultural sector** 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. Please explain the difference in figures.	Agricultural employment is 0.5% based on OXLep data, this would lower the sensitivity of land use (which is already low). This 0.6% difference is negligible and makes no material change in the assessment.

ExQ1	Question to	Question	Applicant's Response
Q1.16.13	Applicant	**Outline Skills and Employment Plan – Table 6.1** 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. Please confirm and amend if necessary	Section 6.3 is a whole section dedicated to Skills. There are 3 opportunity areas related to this (Opportunity 1: Apprenticeships; Opportunity 2: Other Workforce Training and Opportunity 3: STEM Education and Careers).
Q1.16.14	Applicant	**Outline Skills and Employment Plan – content** 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: • Paragraph 6.3.5 states that '…the Applicant will consider a programme to promote apprenticeships during the various phases of the Project.' • Paragraph 6.3.6 states that 'The Applicant will consider other interventions to support the training of employees and workers on the Project'. • Paragraph 6.3.17 states that 'The Applicant will consider setting up visitor and education programming near the for educational visits and technical exhibitions'. • Paragraph 6.4.9 states 'The Applicant could introduce initiatives to maximise the diversity of the workforce'. 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	The Applicant is committed to the measures set out in APP-129, Project Mitigation Measures and Commitments Schedule. However, The Applicant will review the OSEP **[APP-218]** and amend to include actions to be carried out if the SEP does not deliver the potential outputs. This will be submitted at Deadline 3

ExQ1	Question to	Question	Applicant's Response
		considered necessary, please provide a full explanation.	
Q1.16.15	All local authorities	**Outline Skills and Employment Plan – delivery** 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.	
Q1.16.16	Applicant	**Outline Skills and Employment Plan – monitoring** 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. Please review and amend where necessary. If no amendments are considered appropriate, please provide a full explanation.	The Applicant will review the OSEP **[APP-218]** and amend to include actions to be carried out if the SEP does not deliver the potential outputs. This will be submitted at Deadline 3.
Q1.16.17	Applicant	**Full Time Equivalent Jobs** 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.	**Construction Phase FTE jobs** ES Chapter 15 [**APP-052**] states that the construction phase of the Project is estimated to create up to around 199 local direct FTE jobs, which is common to Table 3.1 in the OSEP [**APP-218**]. However, Chapter 15 also confirms that it is then necessary to also consider the jobs lost as a result of the change of use from agriculture, during the construction phase. The Agricultural Land Use Chapter identifies that 1,351.2ha of agricultural land will be needed for the Project. On this basis, it is estimated (using the *John Nix Farm Management Pocketbook* (2024) methodology described in section 15.9.102) that this would support approximately circa eight direct local FTE employees, resulting in an overall net gain in direct employment as a result of the Project of 191 direct local FTE jobs during the construction phase. As commented at Q 1.16.11 above, the OSEP focus is solely on construction employment therefore does not include any net deductions from agricultural employment temporary loss. However the SEIA includes net deductions. Therefore both figures are correct in terms of their intended use.

ExQ1	Question to	Question	Applicant's Response
			Operational & Maintenance Phase FTE jobs ES Chapter 15 [**APP-052**] states that the operational and maintenance phase is estimated to create 20 FTE jobs in the local economy, which is common to Table 3.2 in the OSEP [**APP-218**]. Chapter 15 also states that it is estimated that 8 net FTE jobs will be lost as a result of the 'temporary cessation' of agricultural use. The GVA per agriculture, fishing and forestry employee in Berkshire, Buckinghamshire and Oxfordshire (smallest area for which data was available) equates to approximately £37,899. this will result in a loss to GVA of approximately £0.3m per year or £0.6m over the 24-month construction programme. Overall, the construction phase will result in a total net gain in GVA of circa £16.4m. The amount of agricultural employment generated by the proposed conservation grazing activity is not yet fully confirmed, but is likely to be 2 FTE. The Applicant will provide an updated tabulation of FTE jobs, for both construction and operation and maintenance phases, that will confirm this, as part of the Applicant's response to Deadline 3.
Q1.16.18	Applicant	**Decommissioning – indirect jobs** 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. Please provide details of the indirect job figures used to reach this conclusion.	This is not considered within the SEIA as part of the significance consideration and is only stated for context, therefore no assessment is required.
Q1.16.19	Applicant	**Community benefits** 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	This is a mistaken reference. The author of Chapter 15 **[APP-052]** was advised by the legal team that community benefits were not included in the planning balance so would not be assessed as material consideration. They were removed, but the reference in Chapter 6: Project Description **[APP-043]**

ExQ1	Question to	Question	Applicant's Response
		ES Chapter 15 [APP-052]. Please signpost to where this information is located.	was not. The components of the Project that deliver wider 'benefits' to the community (e.g. BNG) are relied upon in the planning balance so are therefore secured through Schedule 1 of the DCO. They are listed in the Applicant's response to PINS Action Point No.15 in the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [**REP1-019**].
Q1.16.20	Applicant	**Sand and gravel extraction** 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. Has the potential effect of the cessation of such extractions been assessed in commercial terms?	The potential economic output temporary cessation is scoped out and not a material consideration as part of the SEIA. However, the application is accompanied by a Mineral Resource Assessment, at Appendix 11.14 [**APP-195**], which considers the impacts of the development on the safeguarded sand and gravel resource, the effects of sterilisation (which is not permanent) and the economic viability and practicability of prior extraction.
Effects on social infrastructure			
Q1.16.21	Applicant	**Education facility building** 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? 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. 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 has been provided in respect of this facility, please confirm what weight should be given to this by the ExA.	Through discussions with the OCC team, an Education Facility was identified as an opportunity. Chapter 16 **[APP-053]** paragraph 16.9.133 includes the statement; "*Provide open and covered space in the solar farm for use by school field trips. An educational area could provide local schools with the basic facilities – benches and a covered area to undertake their own learning activities. Potential to walk to the educational site and potential for guided access to array areas would support both physical activity and learning outcomes for population health. Indicative layout (as set out with Outline Operational Management Plan* ***[EN010147/APP/7.6.2])*** *includes toilet (compost) and minibus parking (either provided or existing). Secured as a requirement of the DCO - via oOMP* ***[EN010147/APP/7.6.2].*** *Location, size and scale will be finalised during detailed design phase and included within the detailed Operational Management Plan. The educational area is illustratively shown in Figure 16.2: Illustrative 3D Views of Educational Facility* ***[EN010147/APP/6.4].*** *The expectation is that there will be post-consent community involvement in the refinement of design and selection of an appropriate location."* A *potential* location was identified to the east of Bladon, on land adjoining existing community facilities (land next to a playground, MUGA, and

ExQ1	Question to	Question	Applicant's Response
			allotments) and where there is a suitable vehicular and pedestrian access, which also serves the Bladon Primary School and the Parish church. In order to take this proposal forward, and to allow it to be considered as additional mitigation, it is now intended to develop the proposals through the submission of a formal Change Request. This is reflected in Change Request Notification 2, as submitted at Deadline 2.
Q1.16.22	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.	Feedback at the statutory consultation phase showed little interest in the retail electricity offer. A retail electricity company with a small number of customers (less than 10,000) offering a discount to the Ofgem cap price would not be financially viable and would struggle to obtain a retail supply licence from Ofgem. Consultee feedback and discussions with parish councils showed a focussed interest in the targeted benefit of the community fund was of great interest. It was decided to remove the retail electricity offer and to increase the size of the community fund. Discussions with Low Carbon Hub demonstrated that the energy efficiency measures that could be enabled by grants from the fund would be far more effective as a benefit than a small discount on electricity prices. The Applicant believes that the solar farm should be promoting energy efficiency rather than subsidising consumption.
Q1.16.23	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.	Monitoring supply chain and employment records is considered additional mitigation because it verifies that local employment and training benefits are realized, engages vulnerable groups, and allows for adaptive management. It supports NEET populations by identifying and engaging them with opportunities, and tailors strategies to better target local needs, ensuring the project remains responsive and inclusive.

2.17 Q1.17 Traffic and Transportation

ExQ1	Question to	Question	Applicant's Response
Local Road Network			
Q1.17.1	Applicant	**Origin of construction staff**	The text set out in Paragraphs 12.7.13-12.7.16 of ES Chapter 12 **[APP-049]** and the associated approach taken ensures a robust assessment is

ExQ1	Question to	Question	Applicant's Response
		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%'.	undertaken. When there is more than one origin of movement, the proportional sum of movement from all of those origins would total 100%. In a theoretical example scenario where there are four origins each with 25% of total movement at each, traffic along the access route would be 25% of total movement at one origin point, 50% of total movement at the points on the access route where two origins have converged, 75% of total movement at the points on the access route where three origins have converged and 100% of total movement at the points on the access route when all origins have converged. Paragraphs 12.7.13-12.7.16 of ES Chapter 12 **[APP-049]** explains that 100% of total construction vehicle movements has been applied to all origins. Using the above theoretical example scenario where there are four origins, if 100% of total movements has been applied to all origins, this would equate to 200% of total movement at the points on the access route where two origins have converged, 300% of total movement at the points on the access route where three origins have converged and 400% of total movement at the points on the access route when all origins have converged. Given that construction vehicle movements cannot exceed 100% of their total, they have been capped at 100% along the access route as explained in Paragraphs 12.7.13-12.7.16 of ES Chapter 12 **[APP-049].** If construction vehicle movements were to exceed 100% that would have the effect of double-counting and overestimating the construction vehicle movements. Thus, 100% of construction vehicle movements has been applied to all origins, however, they are capped at 100% along the access route so as to avoid double-counting and overestimating. In reality, the construction vehicle movements will be spread across all origins similar to the above theoretical example scenario and there should be no requirement to cap the movements along the access route because they would all converge to total 100%. Assigning 100% of all construction vehicle movements at all origins therefore introduces a robust assessment but in doing so results in a requirement to cap those movements at 100% along the access route to remain realistic without double-counting and overestimating.
Q1.17.2	Applicant	**Peak hour vehicle movements**	The peak hour vehicle movements set out in Table 12.23 of ES Chapter 12 **[APP-049]** have been calculated in accordance with the text set out in Paragraphs 12.9.17-12.9.19 of ES Chapter 12 **[APP-049].**

ExQ1	Question to	Question	Applicant's Response
		Table 12.23 of ES Chapter 12 [APP-049] refers to peak hour vehicle movements, provide a breakdown of how these figures were derived.	Paragraph 12.9.19 of ES Chapter 12 **[APP-049]** sets out that the construction vehicles travelling through the junctions during the AM and PM peak hours will be HVs and management staff vehicles. Paragraph 12.9.17 of ES Chapter 12 **[APP-049]** sets out that the construction vehicles (HVs and management staff vehicles) would travel to/from the traffic and transport study area throughout the whole 12 hour construction working day. Paragraph 12.9.17 of ES Chapter 12 **[APP-049]** sets out that rather than spreading those movements across a 12 hour working day, they have been spread over only 10 hours to allow for any hourly variations (noting that any such variations would even themselves out over the whole construction duration) and result in a reasonable assessment (spreading those movements over 10 hours rather than 12 hours results in a higher number of hourly movements). Annex A3 of Appendix 12.6 Construction Vehicle Trip Generation Assumptions [APP-204] sets out the peak daily HV and management staff vehicle movements along each link and Annex A4 of Appendix 12.6 Construction Vehicle Trip Generation Assumptions [APP-204] divides these by 10 (10 hours, as set out in Paragraph 12.9.17 of ES Chapter 12 [APP-049]) to calculate the number of HV and management staff vehicle movements along each link during the peak hours. Table 12.23 of ES Chapter 12 [APP-049] matches the links to the listed junctions and identifies the vehicle movements that oppose one-another and includes those opposing vehicle movements therein.
Q1.17.3	Applicant	**Negligible impact evidence** 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'.	It is generally recognised within the transport planning industry that proposed developments that generate vehicle movements of less than 30 per hour would create negligible impacts upon highway capacity and the operation of junctions/ highways. This originates from the Department for Transport publication 'Guidance on Transport Assessment', 2007, which provided guidance on the transport assessment requirements for planning applications for proposed developments. That publication was withdrawn in 2014, however, and has not been replaced. That publication set out indicative thresholds for when transport assessment is required, one of which was developments that generate 30 or more two-way vehicle movements in any hour. Based upon this, it is generally recognised within the transport planning industry that where

ExQ1	Question to	Question	Applicant's Response
			proposed development traffic flows through a junction is less than 30 vehicle movements per hour, a transport assessment is not required and the impact of such vehicle movements would be negligible.
Q1.17.4	Applicant	**Scoping response** 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?	Following the publication of the Scoping Report and the receipt of the Scoping Response, the Applicant refined the construction vehicle movements as the Project was evolving. Section 42 consultation responses were received from National Highways which set out the main areas of focus and their requirements of the scope for the Transport Assessment and the low peak hour construction vehicle movements set out in Table 12.23 of ES Chapter 12 **[APP-049]** allowed conformity with that scope.
Q1.17.5	Applicant	**Widening of roads during construction** 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.	The Applicant confirms that all road widening works would be retained for the lifetime of the Project, restored upon decommissioning, save for the works to the B4044 Eynsham Road / B4017 Cumnor Road / B4044 Oxford Road mini-roundabout that would be temporary for construction purposes only. These works are secured through Articles 9 and 10 of the draft DCO **[APP-015].** Therefore, only the B4044 Eynsham Road / B4017 Cumnor Road / B4044 Oxford Road mini-roundabout would be restored to its original geometries for maintenance activities. Large vehicles, including HGVs currently turn through this junction and the works would enlarge the junction to provide more space for turning HGVs. This is commensurate with the increased number of daily HGVs that would turn through the junction generated by the construction of the Project. Table 12.7 of ES Chapter 12 **[APP-049]** sets out that HGVs would not be generated during maintenance and such activities would generate a light vehicle (typically a 4x4) daily / weekly. Therefore, there is no requirement for the works to the B4044 Eynsham Road / B4017 Cumnor Road / B4044 Oxford Road to be retained for the maintenance period and the applicant can confirm that its original geometries remain suitable for maintenance activities.
Q1.17.6	Applicant	**HGV route** A proposed route for HGV vehicles has been provided in Appendix A1 of the outline code of construction practice document [APP-232]. 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	The Outline Construction Traffic Management Plan (OCTMP) forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and sets out the HGV access routes at Appendix A1. Paragraph 1.3.7 of the OCTMP **[APP-232]** sets out that the Principal Contractor and any sub-contractor(s) will be required to comply with the agreed routeing plans and will ensure that all drivers are informed of the need to restrict HGV movements to those specified routes.

ExQ1	Question to	Question	Applicant's Response
		case? What would be the effects, how have you assessed those effects and how would you mitigate those effects? 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.	Section 1.11 of the OCTMP **[APP-232]** sets out how the measures contained therein will be monitored and enforced, including the access routes. The OCTMP **[APP-232]** and its measures, monitoring and enforcement contained therein, including the HGV access routes and the requirement for the Principal Contractor and any sub-contractor(s) to adhere to those routes, is secured at Schedule 13 of the Development Consent Order **[APP-015].** The applicant confirms that there are no Project related instances envisaged where it may be necessary to deviate from the access routes set out in the OCTMP **[APP-232].**
Q1.17.7	Applicant	**Low sensitivity links** 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.	The criteria for defining sensitivity of traffic and transport receptors is set out in Table 12.8 of ES Chapter 12 **[APP-049]** and is based upon professional judgement using guidance set out in 'Environmental Assessment of Traffic and Movement', Institute of Environmental Management and Assessment, 2023. The consideration of vulnerability, recoverability and value are based upon professional judgement using guidance set out in 'Environmental Assessment of Traffic and Movement', Institute of Environmental Management and Assessment, 2023, and with consideration to the sensitivity of the link that itself is derived from Table 12.8 of ES Chapter 12 **[APP-049].** Taking paragraph 12.11.10 as an example, links 5 and 10 were defined as low sensitivity in accordance with Table 12.8 of ES Chapter 12 **[APP-049].** With consideration to that along with the nature of the impact and the guidance set out in 'Environmental Assessment of Traffic and Movement', Institute of Environmental Management and Assessment, 2023, using professional judgement they were deemed to be of low vulnerability and low value, whilst its ability to recover from the nature of the impact was deemed to be high.
Q1.17.8	Applicant	**Impact due to access restrictions** 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.	All measures to be implemented to ensure impacts on PROW, residential and business premises due to potential access restrictions, are minimised during cable route installation would be enacted in accordance with Chapter 8 of the Traffic Signs Manual (Department for Transport/Highways Agency (now National Highways) et al., 2009), as described throughout the OCTMP **[APP-232].** Figure 1.1 to 1.6 of the OCTMP **[APP-232]** sets out some example layouts of traffic management measures and features as extracted from Chapter 8 of the Traffic Signs Manual (Department for Transport/Highways Agency (now National Highways) et al., 2009). Paragraph 1.8.7 of the OCTMP **[APP-232]**

ExQ1	Question to	Question	Applicant's Response
			sets out those figures are generic in nature and they are not designed to be specific to any particular location or circumstance but designed to be implemented in accordance with the advice contained within that document. Paragraph 1.9.5 of the OCTMP **[APP-232]** sets out that the open cut trenching on roads [due to cable route installation] is not expected to result in any road closures and would maintain access at all times including for emergency services and for buses. Maintaining access at all times includes access to PROW, residential and business premises. The OCTMP **[APP-232]** sets out the framework from which detailed CTMP(s) will be developed specific to individual locations strictly in accordance with the OCTMP in consultation with Oxfordshire County Council as the Local Highway Authority and National Highways as the highway authority for the strategic road network. The OCTMP **[APP-232]** and the requirement to develop detailed CTMP(s) is secured at Schedule 13 of the Development Consent Order **[APP-015].**
Q1.17.9	Applicant	**Glint and glare impacts on road traffic users** 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? 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?	The outline LEMP **[APP-235]** provides more detail on the proposed landscape and ecological mitigation. The final LEMP and the detailed planting proposals will be agreed with the local planning authorities, as secured by Requirement 6 to the draft DCO. If vegetation is proposed which would not initially screen views of the reflecting panels, temporary fencing will be utilised to screen views towards these sensitive receptors until the vegetation matures sufficiently
Q1.17.10	All Local Authorities	**Transport Assessment (TA), methodology and conclusions**	The Applicant notes this question is directed to others, however, has provided a response to assist the Examining Authority.

ExQ1	Question to	Question	Applicant's Response
		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.	The Applicant notes that the methodology follows recognised guidance and best practice as set out in section 12.4 of ES Chapter 12 **[APP-049]** with the conclusions drawn from the assessments undertaken accordingly in sections 12.9 and 12.11 of ES Chapter 12 **[APP-049].**
Q1.17.11	Oxfordshire County Council (OCC) and other local authorities	**Mitigation measures and securing these in the dDCO** 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?	The Applicant notes this question is directed to others, however, has provided a response to assist the Examining Authority. Transport mitigation is set out in Table 12.20 of ES Chapter 12 **[APP-049]** and the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and is secured at Schedule 13 of the Development Consent Order **[APP-015].**
Q1.17.12	Applicant	**Cable drums** In Table 18.25 of ES Chapter 18, there is reference to cable drums being used. In this respect 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? 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.	Cable drums would be delivered directly to a construction compound for recording and inspection. The cable drums are not of a weight that would require them to be delivered as an Abnormal Indivisible Load and they would be delivered via HGV. Cable jointing works would take place within the highway, however, these works would not generate any vehicle movements and no additional traffic management would be required over and above those adopted for the cable trenching works. All necessary cable jointing materials – resin kits and sleeves – are compact and would be transported within the cable trenching crew's vans. No specialist vehicles or HGVs are generated as part of the cable jointing works. The cable jointing works are undertaken by the crew members within the confines of the cable trenching works and therefore no specific traffic management would be required on account of the cable jointing works. The traffic management that is adopted for the cable trenching works would also function as the traffic management for the cable jointing works.
Q1.17.13	Applicant	**Scope of the Assessment** 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	Paragraph 6.4.1 of ES Chapter 6 Project Description **[APP-043]** sets out that during the operational phase, activity on the Site will be minimal and will be restricted principally to continued agricultural use, landscape and ecology management, equipment/infrastructure maintenance and servicing, including cleaning and replacement of any components that fail.

ExQ1	Question to	Question	Applicant's Response
		the panels would need to be replaced at least once. Provide: 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.	Paragraph 6.4.9 of ES Chapter 6 Project Description **[APP-043]** sets out that it is not anticipated that wholescale maintenance or replacement would be required. Table 12.7 of ES Chapter 12 [**APP-049**] sets out that maintenance activities would generate a light vehicle daily / weekly. A light vehicle may visit the Project on a daily basis and may spend that day in one location undertaking maintenance activities before moving onto a different location at the Project the following day. Thus, across the Project as a whole, a light vehicle may be generated every day but at specific locations on the highway network, a light vehicle may be generated weekly. As part of that maintenance, upon identification of a module failure / deterioration, modules and components would either be contained within the maintenance vehicle and replaced as required or would be brought to site the next day / visit as part of their regular and ongoing maintenance process and replaced. Appendix 12.6: Construction Vehicle Trip Generation Assumptions [**APP-204**] sets out that modules for the whole Project require only 94 deliveries; this equates to only 0.2% of the total construction deliveries for the whole Project. Notwithstanding, it is not anticipated that wholescale maintenance or replacement would be required and any requirement for replacement would be undertaken as part of the ongoing maintenance activities which would generate a light vehicle daily / weekly. On this basis an assessment of operational and maintenance traffic is scoped out in accordance with Table 12.7 of ES Chapter 12 **[APP-049].**
Q1.17.14	Applicant	**Road condition assessments** 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?	The condition of highways and their suitability for use by construction traffic has been determined by observations via site visits. Paragraph 12.4.11 of ES Chapter 12 [**APP-049**] details the site-specific surveys that have been undertaken to inform the assessment, however, on-site observations are not a survey as such and so was not listed. Section 1.10 of the OCTMP **[APP-232]** sets out that highway condition surveys will be undertaken to identify and remedy any damage to highways as a direct result of the passage of HGVs associated with construction work. It sets out that roads, methods and schedules of surveys will be agreed with the relevant highways authority as part of the detailed CTMP(s). It is envisaged, and is normal practice, for highway condition surveys to be undertaken post consent

ExQ1	Question to	Question	Applicant's Response
			and just prior to construction commencing so as to determine the condition of highways at a representative point in advance of construction vehicles being generated.
Q1.17.15	Applicant	**Cumulative delays** 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?	The works undertaken would be linear in nature and move along the highway as the works progress. Due to the open cut nature of the works along the highway, they would be 'moving' works whereby excavations are made for installations and those excavations are extended in one direction whilst being backfilled and restored in the other direction. As such, there is no requirement for concurrent works in adjacent locations that could create cumulative driver delay effects. Notwithstanding, the Project will adhere to the 'Oxfordshire Permit Scheme for Road Works and Street Works (2019), which Oxfordshire County Council operate under their duties as part of the Traffic Management Act 2004, and this scheme organises and co-ordinates street works to maintain the safe and efficient use of road space. This includes the co-ordination of street works to minimise driver delay with all adjacent street works requirements scheduled accordingly. Adjacent street works that could create cumulative driver delay effects is not expected, however, notwithstanding, the Oxfordshire Permit Scheme would be adhered to that would co-ordinate all such street works (not just those of the Project) to minimise cumulative driver delay effects.
Q1.17.16	Oxfordshire County Council	**Permit Scheme** 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?	The Applicant notes this question is directed to others, however, has provided a response to assist the Examining Authority. The Project will adhere to the 'Oxfordshire Permit Scheme for Road Works and Street Works (2019), which Oxfordshire County Council operate under their duties as part of the Traffic Management Act 2004.
Q1.17.17	Oxfordshire County Council	**Planned road improvements** The Local Impact Report notifies of planned improvements to the A40 and B4449 interchange with a roundabout. # 1) Would protective provisions in the dDCO be a means to resolution for this issue, protecting the integrity of those works?	The Applicant notes this question is directed to others, however, has provided a response to assist the Examining Authority. The Applicant notes Oxfordshire County Council's comment in their Local Impact Report and confirms it is in ongoing dialogue with Oxfordshire County Council and will discuss this direct together with progressing a Statement of Common Ground.

ExQ1	Question to	Question	Applicant's Response
		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			
Q1.17.18	National Highways	**Integrated transport assessment** 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)?	The Applicant notes this question is directed to others, however, has provided a response to assist the Examining Authority. Chapter 12 of the ES **[APP-049]** integrates the contents of a Transport Assessment to the chapter. A Transport Statement is a less onerous version of a Transport Assessment that is prepared for development proposals with fewer / lower transport implications than those for which a Transport Assessment is prepared. The integration of the contents of a Transport Assessment is therefore in accordance with the comments set out in Table 12.4 of the ES **[APP-049].**
Q1.17.19	National Highways	**Impact assessment on A34** 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.	The Applicant notes this question is directed to others, however, has provided a response to assist the Examining Authority. The Applicant notes that the methodology follows recognised guidance and best practice as set out in section 12.4 of ES Chapter 12 **[APP-049]** with the conclusions drawn from the assessments undertaken accordingly in sections 12.9 and 12.11 of ES Chapter 12 **[APP-049].** In undertaking the assessments, section 12.7 of ES Chapter 12 **[APP-049]** and Appendix 12.6 Construction Vehicle Trip Generation Assumptions **[APP-204]** sets out an access strategy for construction vehicles whereby all deliveries will be from the A34. Rather than a proportional assignment whereby the sum of all movements total 100%, section 12.7 of ES Chapter 12 **[APP-049**] and Appendix 12.6 Construction Vehicle Trip Generation Assumptions **[APP-204]** sets out that all construction deliveries have been assigned to all parts of the A34. This results in the sum of all movements totalling more than 100%, however, all such movements on all highway links have been capped at 100%. This therefore creates a worst case and robust assessment of impacts upon the Strategic Road Network within section 12.9 of ES Chapter 12 **[APP-049].**

ExQ1	Question to	Question	Applicant's Response
Public Rights of Way			
Q1.17.20	Local Authorities	**Diversions and re-provision** 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.	
Q1.17.21	Local Authorities	**Quality of the rights of way** 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.	
Q1.17.22	Applicant	**Length of diversion** 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.	The indicative details of the diversions proposed and measures to manage the PRoW network are contained in the outline Public Rights of Way Management Plan **[APP-232]** Table 1.2 and Figures A1 to A21, which is secured through Requirement 11 of the draft DCO.
Air traffic and aviation safety			
Q1.17.23	Applicant	**Reduction in development area** 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	1) The exclusion zone proposed by Oxford Aviation Services did result in a reduction of developable land. However, to offset this, the Applicant reduced the spacing between tables to 1.7 meters and adjusted the panel tilt. These optimisations have limited the overall impact, with the estimated energy yield decreasing by only 2.3%. 2) The Applicant has submitted a Change Request 2 notification alongside this Deadline 2 submission which includes a proposed change in relation to the land near Oxford Airport. This proposed change seeks to reduce the solar installation area in response to the safety concerns.

ExQ1	Question to	Question	Applicant's Response
		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?	
Q1.17.24	Defence Infrastructure Organisation	**RAF Weston on the Green** 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?	
Q1.17.25	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.	Noted. The examples shown in the TASR show a wide variety of operational solar farms in the vicinity of UK aerodromes. Examples of on-airfield solar and/or solar PV directly under the approach path include Turweston Airport and MOD Lyneham. The Applicant is in discussion with Oxford Airport on this matter through the SoCG.
Q1.17.26	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.	A number of solar farms around the UK have been developed in the proximity of aerodromes, as shown in the TASR. The Applicant has not been able to identify any work that reported an increase in bird strike risk associated with such developments. Further, research undertaken in the US where the development of solar sites on airports has been popular, suggested that solar sites were not a threat to aviation (DeVault *et al*. 2014). Bird strike risk is driven primarily by larger birds, in particular flocks of gull/corvid-sized birds. Such birds require large, open fields to forage within or tall woodland to nest in. As such, solar developments are inherently unattractive to birds that might pose a threat to aviation.

ExQ1	Question to	Question	Applicant's Response
			Notwithstanding this, the Applicant is in discussion with Oxford Airport on the matter of bird strike risk through the SoCG. This includes reviewing the habitat measures to be delivered through the oLEMP in proximity to Oxford Airport to ensure they are compatible with the CAA guidance on managing wildlife risk at aerodromes.
Q1.17.27	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.	
Q1.17.28	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?	The Applicant is in discussion with Oxford Airport on the matter of the substation through the SoCG. The substation will be positioned below the Obstacle Limitation Surfaces, and will therefore not require aviation lighting.

2.18 Q1.18 Waste and Minerals

ExQ1	Question to	Question	Applicant's Response
Waste			
Q1.18.1	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?	The Applicant considers that its assessment is robust and is accordance with the guidance set out in IEMA's Guide to Materials and Waste in Environmental Impact Assessment (IEMA, 2020).
Q1.18.2	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	The Applicant notes that material excavated for the Project main substation and National Grid substation will be retained on site and intended to be re-used in landscaping and restoration of the site during and after construction (see paragraph 6.4.23 of ES Chapter 6: Project Description **[APP-043].**

ExQ1	Question to	Question	Applicant's Response
		National Grid substation. Provide the data or explain with reasons why such data is missing.	
Q1.18.3	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?	The Applicant confirms that damaged photovoltaic panels would be removed from site and recycled by an authorised processor as required by the WEEE Regulations 2013 (as amended). Photovoltaic panels are listed under category 14 of the WEEE Regulations, which seek to reduce the amount of WEEE incinerated or sent to landfill.
Q1.18.4	Applicant	**Bill of Quantities** The Applicant is requested to provide a bill of quantities for the resources required for the proposed development.	The Applicant notes that a bill of quantities will be determined at the detailed design information.
Q1.18.5	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.	The Applicant confirms that battery storage does not form part of the Project description and therefore, does not require the disposal of Lithium-ion batteries.
Minerals			
Q1.18.6	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.	
Q1.18.7	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	

ExQ1	Question to	Question	Applicant's Response
		cables in situ during decommissioning, are you concerned about potential damage to the mineral resource as well?	
Q1.18.8	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'.	When the operational phase ends, the solar farm will require decommissioning, as specified by the Requirements of the DCO. Decommissioning will involve removing all infrastructure (excluding certain cables and the NGET substation) according to a Decommissioning Plan, prepared in line with the Outline Decommissioning Plan **[APP-236]**, secured under Requirement 14 of the Draft DCO **[AS-009].** On completion of decommissioning, the land then returns to the original landowner, who would be open to use the land for its original land use or continuing community food production if preferred in some areas. In line with paragraph 5.11.19, the temporary nature of the Project will not impede long-term use of the land post-decommissioning. The outline Decommissioning Plan (oDP) **[APP-236],** submitted with the application, paves the way for more detailed commitments to be made and requirements to be set with any approval of the DCO that will ensure that the development is decommissioned appropriately after the project lifetime, and that suitable restoration occurs. In terms of mitigation, the principles of incidental extraction would be adopted during development-related construction works. Where safeguarded resource is encountered during such works, e.g., as part of trenching / utilities / piling works, that material will be reused during the construction under the Materials Management Plan (CoT 11.4), and / or made available to local market.

(1) Replace solar installation area for further archeological protection and management (0.30ha)

(3) Small reduction in redline (0.015 ha)

(2) Replace solar installation area for further archeological protection and management (0.17ha)

N

Legend

Order Limits DCO Submission

Order Limits Rev.1, s51 Response

Proposed Infrastructure and Land Use Elements *

Areas for sensitive archaeological site protection and management

Solar Panels

Maintenace Road

Fence

Access Gate

PCS

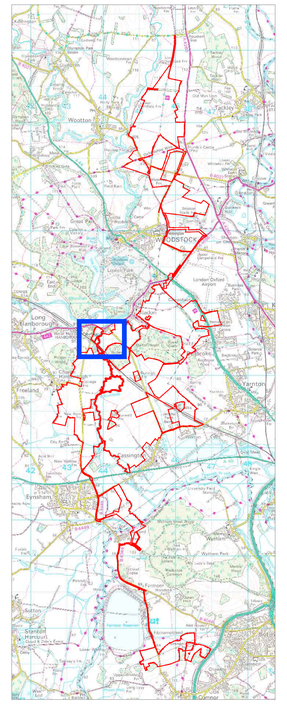
Indicative 33kV Cable Route

Project Refinements

(1) Replace solar installation area for further archeological protection and management (0.30ha)

(2) Replace solar installation area for further archeological protection and management (0.17ha)

(3) Small reduction in redline (0.015 ha)



* *The location of the proposed infrastructure and land use elements are shown indicatively only.*

A: s51 Response						
Project: Botley West Solar Farm				Status: Illustrative		
Id.	Changes	Date	Name		Date	Name
				Edit	31.01.2025	V. Guskova
				Check	31.01.2025	H.Trabelsi
				Drawing No	Appendix A	
A	Created	31.10.2024	V.Guskova			

APFP Regulation: 5(2)(j)

Scale: 1:1250 at A0

Title: s51 Response - Project Refinements

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PINS ref: EN010147

Report ref: EN010147/APP/12.2 - Appendix 2

Date: 12/06/2025

Appendix 2 - Response to Q. 1.10.13
Review of GWP Consultants LLP report (Carpenter, 2024)

1 Introduction

As part of the examination stage, we have been requested to provide bespoke comments on the flood risk report prepared by GWP Consultants LLP on behalf of Cumnor Parish Council, submitted at DL1.

This technical note details the overview of the conclusions made by Carpenter (2024) and provides comments by RPS regarding the study's conclusions specific to the Botley West Solar Farm.

2 Surface Water Runoff

The report by Carpenter (2024) concludes that surface water runoff will increase as part of the introduction of solar panels within the site. The pertinent literature referenced has been reviewed in consideration of the Botley West Solar Farm.

2.1 Gullota et al. (2023)

2.1.1 Summary

"Gullotta et al (2023) found that whilst there were no practical changes in run-off immediately after installation, that in the long-term, peak run-off rates increased by 20-35% due to changes to the vegetation and soils, principally: increased saturation of the access corridor due to panel run-off drip-lines; corridor soil compaction due to maintenance vehicles resulting in reduced infiltration; and lower vegetation growth under the panels due to shading. This last finding directly invalidates the Applicant's comments about expected increased vegetation growth under the panels inhibiting run-off. The 3 contributing factors result in faster surface water run-off, greater total run-off volumes (up to 5%) and increased velocities, which logically will result in more erosion. It should be noted, it is peak run-off which is primarily responsible for flooding."

2.1.2 RPS Comments

The study uses the EPA's Storm Water Management Model to evaluate the impacts of solar panels on runoff potential. The study assumes that all the water falling on the panel area flows off at the lowest leading edge. The area between solar arrays is referred to in the study as 'corridors.'

The design of Botley West Solar Farm ensures that there are gaps between each of the solar cells to ensure that water falls through the solar panels across the array. Therefore, water will be distributed beneath the under-panel area, not just to the corridors. Therefore, the assumption that water will become oversaturated in the corridor is not correct in this instance, as water will be distributed across the solar fields due to the inherent built-in design of Botley West Solar Farm. The design ensures that any runoff is distributed as close to the existing baseline conditions as possible.

The study has gone on to model the impacts of solar panels on runoff. The following assumptions are made, which in the instance of West Botley are not appropriate for comparison to the project:

- *"The precipitation input is set up for subcatchments representing panel areas and corridors but not for those representing under-panel areas."* Due to the gaps between solar cells, across the solar arrays, precipitation will fall to the under-panel area, as well as the corridor for Botley West Solar Farm.
- *"Infiltration is allowed for all the subcatchments except for those representing panel areas."* Infiltration will take place beneath the solar arrays as well as the corridors for Botley West Solar Farm.
- *"Panel areas in the PV park are modelled as totally impervious subcatchments with inclination β = 30° to the horizontal. This inclination is common for PV installations at the latitude of south Italy."* The slope of panels will be 12 to 18° to the horizontal for Botley West Solar Farm.
- *"Progressive reduction (by 10% and 20%) of the original roughness coefficient is supposed for corridors and under-panel areas in order to evaluate the impacts on runoff of long term changes in surface roughness induced by the presence of the solar park (long-term condition)."* The mitigation measures set out as part of the commitments of the Botley West Solar Farm ensure that long-term soil management and landscape cover are maintained. Due to the existing agricultural use, the project is anticipated to have greater long-term vegetation cover than previous agricultural practices, which can result in bare soil. As such, no reduction in the long-term degradation of Botley West Solar Farm.

Based on the above, the results of the modelling and study are not deemed appropriate in the context of the development project. The study should not be used as a direct comparison to assess the Botley West Solar Farm surface water runoff impacts.

2.2 Galzki et al (2024)

2.2.1 Summary

"Galzki et al (2024) undertook research on 5 commercial solar farms in the USA over a wide range of climatic conditions. They found that run-off from a fixed panel was approximately 10 times that from the incident precipitation rate on average, and that run-off increased by 14% for widely spaced panels, to 23% for narrowly spaced panels – note this did not include soil compaction in the access corridors. Panel orientation relative to the ground slope angle was also found (as would be expected) to be important, with panel rows orientated on the landscape contours generating less run-off than those installed up and down the hillslope. Increases in soil density in the access corridors (as would be caused by maintenance vehicles) also increased storm water runoff."

2.2.2 RPS Comments

The study provides a runoff calculator where various user inputs can be included to assess their impact on runoff. These user inputs are soil texture, soil depth, soil bulk density, vegetative cover, presence or absence of solar arrays, panel spacing, panel width and orientation, and slope.

Similarly to the above Gullota et al. (2023) report, this modelling assumes that water drips from the lowest leading edge only. As previously discussed, this is not the case, and it is apparent that this is a fundamental limitation in using the modelling results for the Botley West project.

The modelling results determined that design storm size, soil bulk density, and soil profile depth had the biggest impacts on runoff. As part of Botley West Solar Farm construction, operation and decommissioning mitigation measures, including commitments, are proposed to ensure that the soil is not compacted. The vegetation of the ground helps to encourage this, and during operation, limited access and vehicle movement will be present at Botley West Solar Farm. This encourages the improved growth of planted vegetation cover..

Ground cover is also noted as being an important consideration of PV installations within the study. Conversion of low-impact ground cover (forest/mature prairie) to high-impact ground cover (gravel/bare soil) should be avoided. Botley West Solar Farm ensures the seeding of vegetation across the site to ensure that there is less bare soil than in the baseline agricultural conditions. As

such, the ground cover is being improved as part of the project, which the study correlates to reduced runoff rates.

Overall, the fundamental simplification of water falling off the lowest leading edge does not accurately represent the Botley West Project. In addition, the most pertinent issues raised as concerns to surface water runoff are appropriately managed through the Botley West Solar Farm design during the construction, operation and decommissioning stages.

2.3 Lieu et al (2023)

2.3.1 Summary

"Liu et al (2023) investigated the effects of solar farms on soil erosion. He concluded that the effects of concentrating rainfall along solar panel downslope edges and the reduction in vegetation beneath the panels (due to 67-90% less solar radiation from panel shading), increased storm run-off peak flow rates by between 7% and 73%, and annual total run-off by between 14% and 4,046%, with erosion increasing by 58% to 88%. Liu identified rainfall intensity increasing by 5 times at the drip line compared to natural rainfall intensity. Liu also highlighted that once erosion commenced, this accelerated erosion rates increase further as it further concentrates overland flow into run-off channels. Liu also highlighted the particular risks during the construction period when vegetation removal and vehicle movements are at their greatest."

2.3.2 RPS Comments

The above study was conducted in Santa Margherita Belice (Agrigento, Sicily). A 'bare soil' hillslope was investigated. The runoff was assessed with and without solar panels. A solar array slope of 14° to horizontal was used. The results showed that solar panels increased the outlet discharge when panels were arranged in a cross slope and aligned slope layout, by 11.7 and 11.5 times, respectively, compared to bare soil.

The study concluded that agricultural soils should preferentially not be left bare under solar panel structures, because of an increased risk of runoff and of the relative soil erosion process.

The Botley West Solar Farm notes this as a potential risk. There is a notable change between the pre- and post-ground conditions for Botley West Solar Farm. Botley West Solar Farm will provide year-round vegetation across the project to ensure a reduction in bare soil. Similarly, gaps between solar cells will promote water falling to the underside panels to ensure dissipation of water across the arrays.

Therefore, as part of the measures set out in the Botley West Solar Farm, the impacts of the study will be avoided. In addition, there will be a promotion of improved vegetation to ensure there is not a significant impact in runoff.

3 Additional Omissions and Concerns

3.1 Ordinary Watercourses

3.1.1 Carpenter Comments

"The site has at least 10 No. Ordinary Watercourses passing through the development land parcels and numerous more ancillary drainage routes. These demonstrate in xx locations that surface water will also flow onto the site from land upslope of the solar panel land parcels. Such run-off will increase the amount of run-off on the site that needs to be captured and managed – thereby overwhelming any surface water management structures sized for the development area or subareas, unless perimeter drainage is installed to prevent off-site areas draining onto the on-site land. This issue has not been recognised by the Applicant, in large part because they do not recognise the need to manage surface water over the entire area with solar panels. It is not demonstrated that all land areas draining onto the site can be routed around the development. Where they cannot, then such areas will contribute to overwhelming the on-site water management infrastructure, increasing downslope flood risk."

3.1.2 RPS Response

As detailed within the FRA and Conceptual Drainage Strategy, and additional information reviewed as part of this technical note, there is no substantial evidence that solar panels will increase runoff. Therefore, there is no requirement to capture and restrict runoff rates to ordinary watercourses, as the runoff to these watercourses is to be negligible when compared to baseline conditions.

3.2 Outline Infrastructure Drainage Strategy

3.2.1 Carpenter Comments

"The documents refer to an Outline Infrastructure Drainage Strategy, which will be submitted with the DCO application. Without being able to critique the content of this Strategy, there is no confidence it will provide adequate drainage measures to reduce the on-site run-off to predevelopment levels."

"The documents refer to an Infrastructure Construction Drainage Scheme, which will be submitted with the DCO application. Without being able to critique the content of this Scheme, there is no confidence it will provide adequate temporary drainage to retain the on-site run-off and run-off turbidity (suspended sediment) concentrations at pre-development levels. It should be understood that construction phase surface water management also requires the clarification of run-off water to reduce the inevitable increases in turbidity (sediment) that occur during the construction period. Such clarification places further constraints on run-off management, necessitating further land take for settlement ponds and/or larger attenuation basins to restrict flows to low rates to enable the use of turbidity settlement units. Clearly for this development with dozens of micro-catchments flowing off hillslopes, this will necessitate dozens of construction phase retention basins and treatment facilities. There is no evidence to demonstrate that these issues have been adequately evaluated to confirm the construction of 1.9 million solar panels in a 14km2 area is feasible. This is not an issue that can therefore be left to an unseen Scheme document.

3.2.2 RPS Comments

A Conceptual Drainage Strategy has been provided as part of the DCO application and details how surface water runoff will be managed.

3.3 Code of Construction Practice

3.3.1 Carpenter Comments

"As with the point above, the Applicant also talks to a Code of Construction Practice (CoCP), which will describe procedures, protocols and control principles on site for, amongst other matters, reducing run-off, managing accidental spillages and pollution control. Without sight of this document, there can be no confidence it will adequately address and mitigate run-off rates and water quality."

3.3.2 RPS Comments

An Outline CoCP has been provided as part of the DCO application and details the requirements set out above. A detailed CoCP will be provided prior to the commencement of any construction on site.

4 Conclusion

As part of this technical report, a review of Carpenter (2024) report has been conducted, and RPS have provided comments on the pertinent findings of this report. Overall, it can be concluded that as detailed in the Hydrology and Flood Risk ES Chapter will be a negligible increase in runoff rates and no further necessary adjustments to the scheme are required in light of this report.

We trust this information will be sufficient in order to assess the report in the context of Botley West Solar Farm.

Yours sincerely,
for RPS

[redacted]
Senior Hydrologist

cc:

Cassington Parish Council
North Leigh Parish Council

PINS ref: EN010147

Report ref: EN010147/APP/12.2 - Appendix 3

Date: 13/06/2025

Appendix 3 - Response to Q 1.10.14 -
Review of Preliminary Flood Risk and Drainage Appraisal with respect to proposed new Solar Farm Development on Adjacent Land (RSK Land and Development Engineering Ltd, 2024)

1 Introduction

As part of the examination stage, we have been requested to provide bespoke comments on the flood risk report prepared by RSK Land and Development Engineering (LDE) Ltd., submitted at DL1.

This technical note details the overview of the conclusions made by LDE (2024) and provides comments by RPS regarding the study's conclusions specific to the Botley West Solar Farm.

LDE were commissioned by Worton Farms to investigate a site at Worton Park. This is relating to observed flooding issues emanating from land to the north, and also to provide an initial appraisal regarding the potential impacts for the subject site of a proposed solar farm development on land to the north. The site is situated to the south east of the proposed Botley West Solar farm.

2 Baseline Conditions

Existing flood risk issues are present at Worton Park, particularly along the access roads.

Whilst the theoretical flood risks to the majority of the Worton Park site are assessed as low, recent flooding has been observed to the main Worton Park site access road and the residential properties located close to this access. This flooding is occurring as a result of the ordinary watercourse to the north surcharging two culverts directly north of the site access underneath the Thames Water access road and Yarnton Road.

Water enters the site via land drainage inflows from arable fields, which are culverted beneath Yarnton Road, before being channelised down Worton Park access road. The report concludes that the risk is due to overland flow onto the road.

3 Impact of Botley West

The impact of Botley West is considered within the report. No quantitative evidence of increased flood risk has been determined as a result of the scheme. The report references the requirements of the NPPF to ensure there is no increase in runoff off-site as a result of the scheme. The NPPF and NPS requirements have been followed within the technical reports submitted as part of the DCO application, referenced within ES Chapter 10 - Hydrology and Flood Risk [**APP-047**], Appendix 10.1 Flood Risk Assessment [**APP-167**] and Appendix 10.2 Conceptual Drainage Strategy [**APP-167**].

The report goes on to suggest that Worton Park Estate Management Team engage with the Highways Authority and Thames Water to ensure that flood risk effects and mitigation are implemented throughout the construction, operation and decommissioning stages.

The proposed solar farm development does not include or require drainage or flood risk mitigation measures off-site as part of the Development Consent Order (DCO). This is because the project is

designed by the NPS and NPPF to manage surface water runoff within the site without exacerbating existing flood conditions beyond the site boundary.

While no off-site mitigation is proposed through the DCO, the project commits to monitoring drainage performance on-site and will cooperate with local authorities if any unforeseen drainage issues arise during construction or operation. Details of mitigation and management of the project are set out in the Outline Code of Construction Practice [**APP-232** and **APP-233**], Outline Operational Management Plan [**APP-234**] and Outline Decommissioning Plan [**APP-236**].

The ES chapter details how, before any construction activities, detailed Thames Water surveys will be undertaken to establish if any infrastructure is present before any intrusive work is undertaken.

4 Conclusion

As part of this technical report, a review of RSK LDE (2024) has been conducted, and RPS have provided comments on the pertinent findings of this report. The existing risk has been noted, and whilst no off-site mitigation is proposed, the scheme is designed to ensure that there is no increase to flood risk off-site as per national and local planning policy.

As part of the detailed Thames Water surveys, the culverts and drainage will be inspected and maintained before construction and throughout the project lifetime.

We trust this information will be sufficient to assess the report in the context of Botley West Solar Farm.

Yours sincerely,
for RPS

[redacted]
Senior Hydrologist

cc:

Cassington Parish Council
North Leigh Parish Council

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Legend

- Order Limits

Proposed Features

- Educational area
- Secondary substation
- Maintenance Roads
- Proposed woodland
- Vehicular access to construction site compound
- Cable 33 kv Crossings
- Installation Area / Meadow
- PCS
- Solar Panel
- Proposed removal or solar installation area, fence, maintenace roads, and gates
- Mineral Consultation Areas

Mineral Safeguarding Areas

- Crushed rock

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

rps A TETRA TECH COMPANY

Client	PVDP
Project	Botley West Solar Farm
Title	Mineral Safeguarding and Consultation Zones

Status	Drawn By	PM/Checked By
FINAL	JM	GR
Drawing Number	**Scale @ A3**	**Date Created**
EN010147/APP/6.4	1:25,000	JUN 2025
Figure Number		**Rev**
11.2a		-

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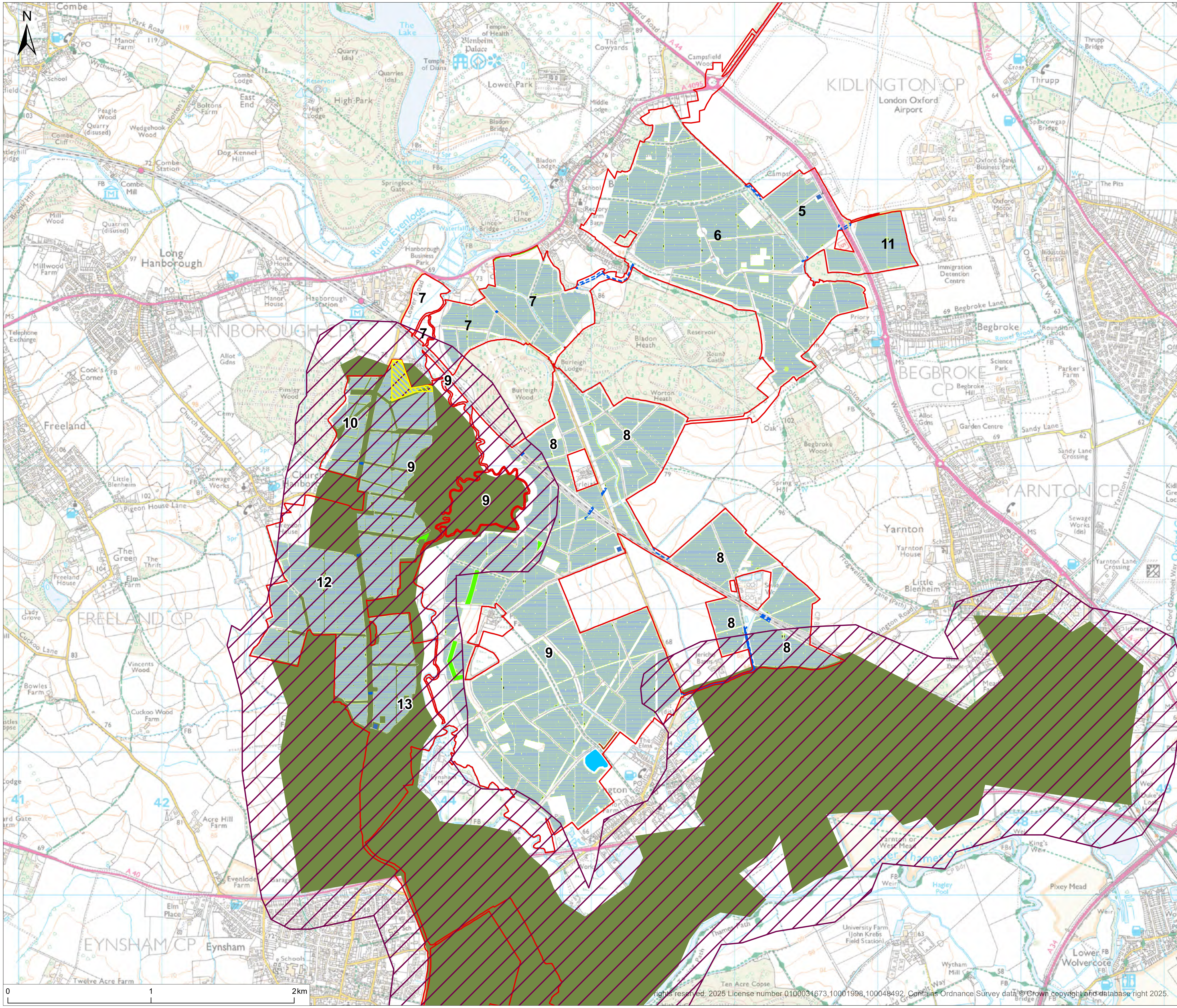

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Legend
- Order Limits

Proposed Features
- Bund
- Educational area
- Proposed bridge
- Proposed pond
- Secondary substation
- Maintenance Roads
- Proposed woodland
- Vehicular access to construction site compound
- Cable 33 kv Crossings
- Installation Area / Meadow
- PCS
- Solar Panel
- Proposed removal or solar installation area, fence, maintenace roads, and gates
- Mineral Consultation Areas

Mineral Safeguarding Areas
- Sharp sand and gravel

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

A TETRA TECH COMPANY

Client PVDP

Project Botley West Solar Farm

Title Mineral Safeguarding and Consultation Zones

Status	Drawn By	PM/Checked By
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Legend

- Order Limits

Proposed Features

- Educational area
- Main substation
- NG substation
- Maintenance Roads
- Proposed woodland
- Vehicular access to construction site compound
- Cable 33 kv Crossings
- Transmission tower
- Installation Area / Meadow
- PCS
- Solar Panel
- Proposed removal or solar installation area, fence, maintenace roads, and gates
- Mineral Consultation Areas

Mineral Safeguarding Areas

- Sharp sand and gravel

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

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Client	PVDP
Project	Botley West Solar Farm
Title	Mineral Safeguarding and Consultation Zones

Status	Drawn By	PM/Checked By
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Botley West Solar Farm

Appendix 5 -ES Clarifications on Design Envelope

July 2025

PINS Ref: EN010147

Document Ref: EN010147/APP/12.2/Appendix 5

Revision P0

Approval for issue	
Jonathan Alsop	1 July 2025

Prepared by:

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United Kingdom

Prepared for:

Photovolt Development Partners GmbH, on behalf of SolarFive Ltd.

1 Introduction

1.1 Purpose

1.1.1 Photovolt Development Partners (PVDP), on behalf of SolarFive Ltd (the Applicant), submitted its application for a Development Consent Order (DCO) for the Botley West Solar Project (the "Project") on 15 November 2024 (the "DCO Application"). The DCO Application was accepted for examination by the Planning Inspectorate on 13 December 2024.

1.1.2 This document responds to Question Q1.9.3 of the Examining Authority's (ExA) first set of Written Questions **[PD-008]** and relates to providing reassurance to the ExA that all assessment reporting in the Environmental Statement (ES) has been completed against the worst-case scenario. Q1.9.3 states:

'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.'

1.1.3 This request refers to the ExA's Rule 6 letter [**PD-006]** that identified discrepancies for some topics between the identified maximum design scenarios, on which the worse-case assessment is based. The Applicant responded at the time with an ES Clarifications Report [PDB-015] addressing the specific discrepancies noted by the ExA and provided updated ES Chapters for some topics.

1.1.4 The Applicant accepts that the request was not exhaustive and that the ExA required a more comprehensive assurance that the worse-case scenario has been assessed for all topics consider in the ES.

1.1.5 For the former response to the ExA's Rule 6 letter [PD-006], the Applicant addressed specific queries around perceived discrepancies/omissions on ES Chapter 7 (Historic Environment), ES Chapter 8 (Landscape & Visual Impact), ES Chapter 10 (Hydrology and Flood Risk), ES Chapter 9 (Ecology & Nature Conservation), and Chapter 13 (Noise & Vibration). In summary, the Applicant responded **[PDB-015]** with the following commentary:

- The Ecology ES Chapter assessed against a greater number of panel/modules than indicated in Table 6.3 'Operational Development Parameters' in ES Chapter 6 Project Description **[APP-043]**. The assessment however remained a worse-case assessment and did not affect the relevant assessment of significance within that chapter. An updated ES Chapter **[PDB-008]** for this topic was submitted correcting the errors on the number of panel/modules.

- Confirmation was provided that the Noise & Vibration ES Chapter made appropriate assessment of construction of the Project

substations. An updated ES Chapter **[PDB-010]** for this topic was submitted expressly identifying this.

- Confirmation was provided that ES Chapter 8, Landscape and Visual Impact Assessment considered the development as a whole in terms of the overall area of landscape, rather than, the individual number of panels. This is of primary importance when considering the environmental effects and is consistent with best practice guidance GLVIA3. The absence of mention to a specific number of panels within the Chapter was not an omission. Notwithstanding, an updated Chapter 8 **[PDB-006]** was submitted that included references to the number of panels for consistency and avoidance of doubt.

- Further queries raised by the ExA around why panel separation distances were stated within ES Chapter 10 (Hydrology & Flood Risk) but not also explicitly referred to in Chapter 8 (Landscape and Visual Impact). Narrative was provided by the Applicant that the LVIA was assessed for the project as a whole, incorporating, effects arising from representative viewpoints. To that extent, gaps between panels had been considered as part of the overall Project assessment. The reported effects for both the LVIA and hydrology chapters, therefore, contain relevant environmental information in EIA terms and the ES remains robust.

1.1.6 In response to the ExA Question 1.9.3, this document sets out in Section 2 the Applicant's detailed review of all ES Chapters for the purpose of provide reassurance that all assessment topics have been conducted on a worse-case basis within the parameter of the Project Description provided in ES Chapter 6 [APP-043].

1.1.7 The review has identified a small number of additional minor inconsistencies/discrepancies where it could be perceived or queried whether the assessment was conducted on a worse-case scenario. These are set out in Section 2 together with the Applicant's clarification.

1.1.8 It is useful to the reader at this stage to understand that our review has not identified any material errors of omissions from the topics assessments within the ES and that all conclusions and assessment of effects remain unchanged.

1.2 Structure of this Report

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

- Section 2: Environmental Statement Clarifications
- Section 3: Conclusions

2 Environmental Statement Clarifications

2.1 Project description

2.1.1 The Applicant's environmental impact assessment of the Project is based upon the project description as set out in Chapter 6 of the ES [**APP-043**]. The project parameters set out in Table 6.3 in that chapter represent the final iteration of a sequence of design refinements and adjustments to the project description made over a period of approximately two years, at the point of submission. In many cases the various components that comprise the project description had changed over that time. Specialist topic authors were provided with the final iteration of the project description for assessment purposes to allow them to finalise their respective topic chapters.

2.1.2 Matters previously identified by the Planning Inspectorate in the Rule 6 letter [**PD-006**] have been responded to in the Applicant's response [**PDB-015**].

2.1.3 For information, the NGET Substation dimensions have also been amended slightly since submission, relative to the assumptions set out at submission, and have been corrected in the Outline Layout and Design Principles document, Rev 3 [**EN010147/APP/7.7**], as well as in the Guide to the Application Rev 5 [**EN010147/APP/1.3**] and Statement in Respect of Statutory Nuisance Rev 2 [**EN010147/APP/3.4**].

2.1.4 Following the Applicant's detailed review of all ES topic chapters, the following further issues have been identified from a comparison between the Operational Development Parameters in Table 6.3 of ES Chapter 6 Project Description **[APP-043]**, and the Maximum Design Scenario tabled within each of the individual topic chapters (ES Chapters 7 to 19):

– Issue 1 - Hydrology & Flood Risk (ES Chapter 10) **[APP-047]**:

- ES Chapter 6 provides the maximum dimensions of the Main Project Substation to be 156m length by 63m width whereas the topic chapter indicates a dimension of 156m by 62m.
- ES Chapter 6 indicates cable depths to be between 0.75m and 1.2m whereas the topic chapter states excavation for the 275kV AC cables will typically be 1.42m deep and 0.60m wide.

– Issue 2 - Hydrology & Flood Risk (ES Chapter 10) **[APP-047]**, Climate Change (ES Chapter 14) **[APP-051]**, Agricultural Land Use & Public Rights of Way (ES Chapter 17) **[APP-054]**, Air Quality (ES Chapter 19) **[APP-056]**:

- The MDS tables for these topic chapters refer only to the maximum area of the NGET as 3.8ha. The physical dimensions of the NGET stated in the ES Chapter 6 Project Description are not specifically referenced.

– Issue 3 - Noise & Vibration (ES Chapter 13) **[APP-050]**:

- For the main project substation, the MDS table states only the area to be 1ha and does not refer to the physical dimensions and sound power output stated in ES Chapter 6.
- The topic chapter refers to the dimensions of the NGET substation as 180m x 150m with a height of between 12-15m, whereas the ES

Chapter 6 Project Description states the *footprint* dimensions to be 87m x 30m with a height of 12m (12.5m for the height of the landing gantry).

– Issue 4 - Climate Change (ES Chapter 14) **[APP-051]**:

- Reference is made to 'Power Control Stations' whereas this is referred to in ES Chapter 6 Project Description as Power Converter Stations (PCS).
- ES Chapter 6 provides the maximum dimensions of the Main Project Substation whereas the topic chapter states a building area of 8,680m^2.

– Issue 5 - Agricultural Land Use & Public Rights of Way (ES Chapter 17) **[APP-054]**:

- ES Chapter 6 indicates the depth of AC cables to be between 0.75m and 1.2m (depth range varying between roadways, fields, footpaths and uncultivated land). The topic chapter states that AC cables would be buried up to 101cm (good agricultural land).

– Issue 6 - Waste (ES Chapter 18) **[APP-055]**:

- The stated area for the southern installation is given in the topic chapter as 50ha against an area of 46ha (where NGET will also be delivered within the Order Limits) stated in ES Chapter 6 Project Description.

– Issue 7 Waste & Resources (ES Chapter 18) **[APP-055]** and Ecology & Nature Conservation (ES Chapter 9) **[APP-046]**:

- ES Chapter 6 indicates a maximum number of 6 Secondary Project Stations whereas the respective topic chapters states the number to be eight / up to eight.

2.2 Issue 1 Clarification

Hydrology & Flood Risk (ES Chapter 10):

ES Chapter 6 provides the maximum dimensions of the Main Project Substation to be 156m length by 63m width whereas the topic chapter indicates a dimension of 156m by 62m.

ES Chapter 6 indicates cable depths to be between 0.75m and 1.2m whereas the topic chapter states excavation for the 275kV AC cables will typically be 1.42m deep and 0.60m wide.

2.2.1 The discrepancy between 63m and 62m is considered immaterial and would not be of a magnitude to influence the conclusion of the hydrology and flood risk modelling completed. The assessment of effects remain unchanged.

2.2.2 It is noted that in recent discussions between the Applicant's technical specialists, engineering team and the Environment Agency over a range of matters, the Flood Risk Assessment **[APP-166]** and Conceptual Drainage Strategy **[APP-167]** are being updated and will form part of the submission for Deadline 3.

2.2.3 The statement in the topic chapter concerning cable depths is an error and is based on an earlier set of construction parameters. This has no bearing on the assessment of derivation of significant effects reported in the ES chapter.

2.2.4 The assessment remains robust and has been conducted on a worse case scenario.

2.3 Issue 2 Clarification

Hydrology & Flood Risk (ES Chapter 10), Climate Change (ES Chapter 14), Agricultural Land Use & Public Rights of Way (ES Chapter 17), Air Quality (ES Chapter 19):

The MDS tables for these topic chapters refer only to the maximum area of the NGET as 3.8ha. The physical dimension of the NGET stated in ES Chapter 6 Project Description are not specifically referenced.

2.3.1 The ES Chapter 10 Hydrology & Flood Risk **[APP-047]** and associated Conceptual Drainage Strategy **[APP-167]** considers the whole 3.8ha area for the NGET substation within its drainage modelling. It accounts for the area of the substation building dimensions (87m x 30m) and conservatively assumes this to be impermeable for the derivation of runoff volumes and rate. The Chapter recognises that *'Whilst a 100% impermeable area is currently assumed, it is understood as the design process progresses buildings will not occupy the entire substation area'.* The assessment is worse-case and the significance of effects are unchanged.

2.3.2 ES Chapters 14 Climate Change **[APP-051]**, the embodied carbon emission of the NGET development has been based conservatively against the maximum area of the compound (3.8ha) using appropriate industry benchmark data. This is considered to be an overcalculation of the embodied carbon used in the NGET building materials. The assessment is worse-case and the significance of effects are unchanged.

2.3.3 ES Chapter 17 ALC & PROW **[APP-054]**, the assessment of the permanent loss of agricultural land is made conservatively for the full maximum area of the NGET station, i.e. 3.8ha. The assessment is worse-case and the significance of effects are unchanged.

2.3.4 For ES Chapter 19 Air Quality **[APP-056]**, there are no combustion emissions during operation and the physical scale of the NGET infrastructure is not relevant to the air quality assessment. The assessment is worse-case and the significance of effects are unchanged.

2.4 Issue 3 Clarification

Noise & Vibration (ES Chapter 13):

For the main project substation, the MDS table states only the area to be 1ha and does not refer to the physical dimensions and sound power output stated in ES Chapter 6 Project Description.

The topic chapter refers to the dimensions of the NGET substation as 180m x 150m with a height of between 12-15m, whereas the ES Chapter 6 states the footprint dimensions to be 87m x 30m with a height of 12m (12.5m for the height of the landing gantry).

2.4.1 ES Chapter 6 Proejct Description **[APP-043]** provides the dimension of the main project substation as 156m by 63m. This equates to an area for the substation compound to be 9,928m2, which rounded up is 1ha.

2.4.2 The topic chapter assesses noise impact from both the main project substation and NGET substation with reference to provided sound power levels provided by the Applicant's engineering team and, for NGET, by National Grid.

2.4.3 At this outline stage in the design, the noise modelling has been completed as a maximum sound power level limit for the substation facility, this is an appropriate approach where the dimensions of substation buildings are not fixed.

2.4.4 The dimensions of the NGET substation stated in the topic chapter is an approximate based on the inclusion of the substation building (87m x 30m) and surrounding ancillary infrastructure. This is not fixed and further assessment is required at the detailed design stage. However, this does not have a bearing on the assessment which has been based on a maximum sound power level limit.

2.4.5 The assessment is worse-case and the significance of effects are unchanged.

2.5 Issue 4 Clarification

Climate Change (ES Chapter 14):

Reference is made to 'Power Control Stations' whereas this is referred to in Chapter 6 Project Description as Power Converter Stations (PCS).

Chapter 6 provides the maximum dimensions of the Main Project Substation to be 156m by 63m whereas the topic chapter states a building area of 8,680m2.

2.5.1 Reference in the topic chapter to 'Power Control Stations' are erroneous and should instead refer to Power Converter Stations (PCS). Where this occurs, it is considered that the reader would not be misinformed and would be able to follow the narrative unhindered.

2.5.2 The topic chapter assesses embodied carbon emissions based on a smaller footprint of substation building than indicated in ES Chapter 6 Project Description. The difference in area is 1,148m^2.

2.5.3 This is an isolated error and based on an earlier set of building dimensions. However, when considered in context with the total construction stage emission (calculated at 717,006 tCO_2e) the error, when corrected, equates to an additional 626 tCO_2, equivalent to a change of <0.01% in the overall construction stage emissions. This is immaterial and there is no change to the significance of effects.

2.6 Issue 5 Clarification

Agricultural Land Use & Public Rights of Way (ES Chapter 17):

Chapter 6 Project Description indicates the depth of AC cables to be between 0.75m and 1.2m (depth range varying between roadways, fields, footpaths and uncultivated land) whereas the topic chapter states that AC cables would be buried up to 101cm (good agricultural land).

2.6.1 Installation of cable routing within the construction area. The cable corridors are shown in ES Figures 2.4A to 2.4D **[APP-062]**. The location and size of these corridors will be subject to further detailed design and identification of a narrower and defined cable corridor.

2.6.2 During the cable routing construction there is potential for there to be disruption to farming management, including changes to farm access within individual fields and along local roads, as well as temporary effects on field drainage systems.

2.6.3 With reference to the Soil Management Plan appended to the Outline Code of Construction Plan **[APP-233]**, Section 9 covers Trenching and Cable Laying. The method for this set out the stripping of topsoils and subsoils and for these to be stored separately. On laying of the cable, the soils would be replaced in back in the trench in the reverse sequence ensuring topsoils are replace back at the surface.

2.6.4 The depth that cables are installed is therefore not material to the protection of agricultural soil and the assessment of the effect reported in the ES Chapter are unchanged and remain robust.

2.7 Issue 6 Clarification

Waste (ES Chapter 18):

For the Maximum Design Scenario table, the stated area for the southern installation is given as 50ha in the topic chapter against an area of 46ha (where NGET will also be delivered within the Order Limits) in Chapter 6 Project Description.

2.7.1 Waste streams and volumes have been conservatively calculated based on the worse-case scenario where delivery of the NGET is taken outside of the DCO limits onto adjacent land. This would result in the installation of additional panels on the Southern Area, hence the area for the Southern Site is

considered as 50 ha as a worse-case scenario for waste generation from the Project.

2.7.2 The assessment is worse-case and the significance of effects are unchanged.

2.8 Issue 7 Clarification

Waste & Resources (ES Chapter 18) and Ecology & Nature Conservation (ES Chapter 9):

ES Chapter 6 Project Description, indicates a maximum number of six Secondary Project Substations whereas the ES Chapter 18 states the number to be eight and ES Chapter 9 states up to eight.

2.8.1 There are proposed six secondary Project Substations as indicated by the Project Description in ES Chapter 6 **[APP-043]**. References in topic chapters 18 and 9 to 'eight' and 'up to eight' Secondary Substations are erroneous attributable to an earlier layout arrangement for the Project.

2.8.2 For ES Chapter 18 Waste **[APP-055]**, arisings from construction and decommission have been calculated for all elements of the Project including for the Secondary Substations. The derivation of waste arising volumes for the construction and decommission of substations has been provided by the Project engineering team.

2.8.3 The inclusion of eight Secondary Substations will have resulted in an over estimation of waste volumes and tonnages associated with construction and decommissioning activities as opposed to that from the construction of six Secondary Substations as is correctly proposed for the Project. The assessment is worse-case and the significance of effects are unchanged.

2.8.4 With regard to ES Chapter 9 Ecology & Nature Conservation, the Chapter refers to the 'construction of up to 8 High Voltage Transformers (L18 m x W10 m x H6 m)'. The dimensions stated refer correctly to those of the Secondary Substation as provided in ES Chapter 6.

2.8.5 The assessment of ecological effects has been made against the construction impacts of eight Secondary Substations. The assessment considered the footprint area of foundations for the substation and the resultant loss in area that *'could support protected and/or notable species'*.

2.8.6 The area dimensions for the Secondary Substation considered by the Ecology Chapter have been correctly taken from the Project Description in ES Chapter 6. The assessment of ecological impacts from the building out of Secondary Substations has therefore been over estimated and the true area is reduced on account of the Project requiring six Secondary Substations.

2.8.7 In consideration of this discrepancy against the wider development areas, including that for the NGET Substation, the Main Applicant Substation, the 156 PCS units and piling for the installation of solar modules, the assessment of the footprint from two additional Secondary Substation is immaterial and does not result in any material change. The conclusion of the topic chapter remains worse case and the significant of effects are unchanged.

3 Conclusions

3.1.1 The document reports on matters of minor inconsistencies and discrepancies reported in the Environment Statement as identified by the Applicant following a detailed review.

3.1.2 The review focussed on a comparison of the Maximum Design Scenarios tabled within each of the ES topic chapters against the Project's main design parameters provided in ES Chapter 6 'Project Description'. The review was conducted to provide assurance to the ExA that the ES presents assessment based on the maximum project scale and is therefore considered to be worse-case.

3.1.3 The review exercise has identified a total of seven issues where it could be perceived or queried whether the assessment was conducted on a worse-case scenario.

3.1.4 These issues, identified in Section 2, have been considered and narrative provided to explain the reasoning for why a discrepancy or error has occurred and whether this has resulted in any material change to the assessment and derivation of significant effects.

3.1.5 In summary, none of the issues identified by this review results in changes to the assessment or the significance of effects reported within respective topic chapter of the ES. The ES remains robust and has been conducted on a worse-case development scenario.

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Notes

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Key

Order Limits

Tree with numbered reference. Canopy spread and coloured BS5837:2012 tree quality category as shown below.

Vegetation group with numbered reference. Canopy extents and coloured BS5837:2012 tree quality category as shown below.

Hedge with numbered reference. Canopy extents and coloured BS5837:2012 tree quality category as shown below.

Woodland with numbered reference. Canopy extents and coloured BS5837:2012 tree quality category as shown below.

BS 5837:2012 Tree Quality Categories - Table 1

- Category A - High quality
- Category B - Moderate quality
- Category C - Low quality
- Category U - Unsuitable for retention

Indicative Root Protection Area (RPA). Calculated in accordance with Section 4.6 - BS5837:2012, using the following average diameters:

- Small Trees: 250mm
- Medium Trees: 500mm
- Large Trees: 750mm

Some trees were given more specific diameters where diameters were to small/large to fit these groups.

Designated Ancient Woodland (as per Natural England ancient woodland inventory, via open data publication)

Ancient tree buffer (15m offset) (as per standing advice produced by Forestry England and Natural England)

Veteran tree buffer (15 x stem Ø) (as per standing advice produced by Forestry England and Natural England)

Proposed cable route.

NOTES:

- Refer to RPS Tree Survey Report & Schedule for further details.
- Survey based on a visual inspection from the ground and is not intended as a full arboricultural inspection.
- Plan produced in accordance with recommendations set out in BS 5837:2012 - 'Trees in Relation to design, demolition and construction'.
- Due to the legal protection afforded to breeding birds vegetation removal should not take place during the bird nesting period; generally, although not restricted to, March - August inclusive.
- Survey based upon National Tree Map data purchased by RPS in November, 2022

N

Rev	Description	By	CB	Date
C	Survey extended to cover revised cable route and Sub Stations	SH	DC	30/05/2025
B	Red Line Boundary Change	RC	DC	07/11/2024
A	Red Line Boundary Change	RC	DC	23/10/2023

MAKING COMPLEX EASY

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Client: Photovolt Development Partners

Project: Botley West Solar Farm

Title: Proposed Site Layout Overview

Status	Drawn By	PM/Checked by
For Information	RC	DC

Job Ref	Scale @ A1	Date Created
4631	Custom	July 2023

RPS Drawing / Figure Number: 740

Rev: C

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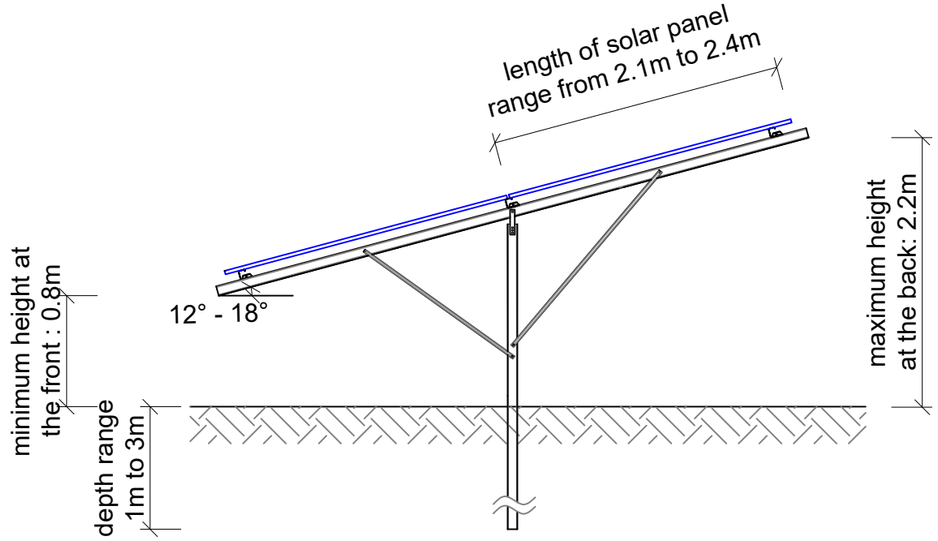
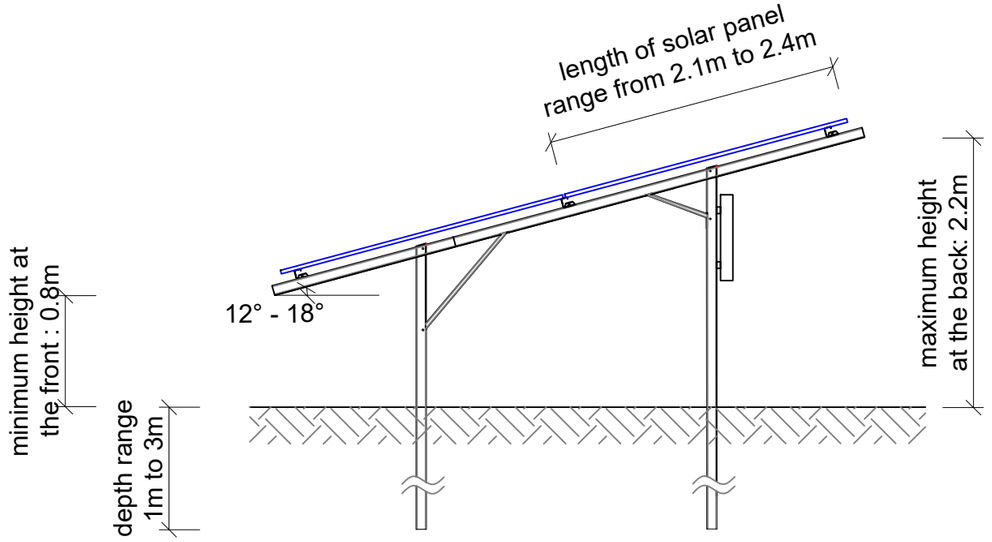
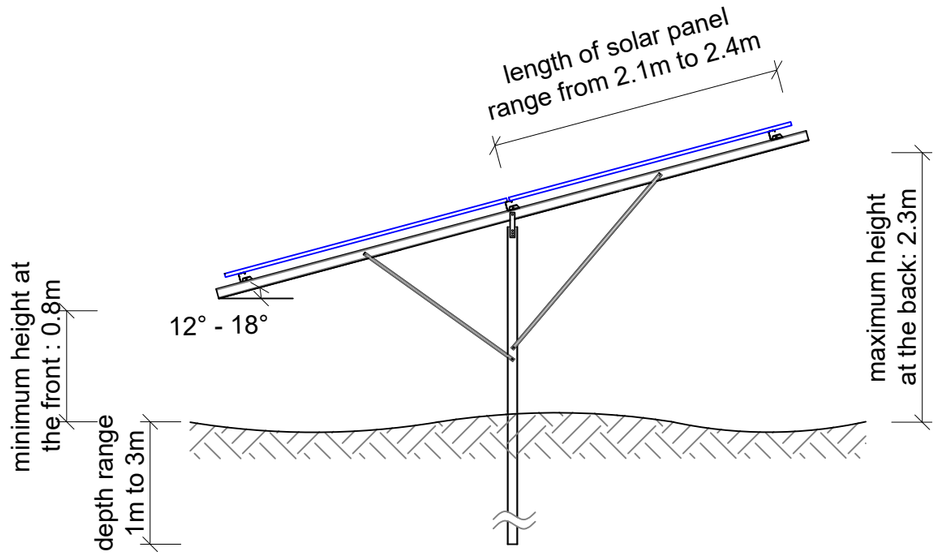
P:\4600 Series\JSL4631 - Land East of Botley - Arb\Tech\ACAD\Current\Arb\JSL4631_740-745C - Proposed Site Layout.dwg

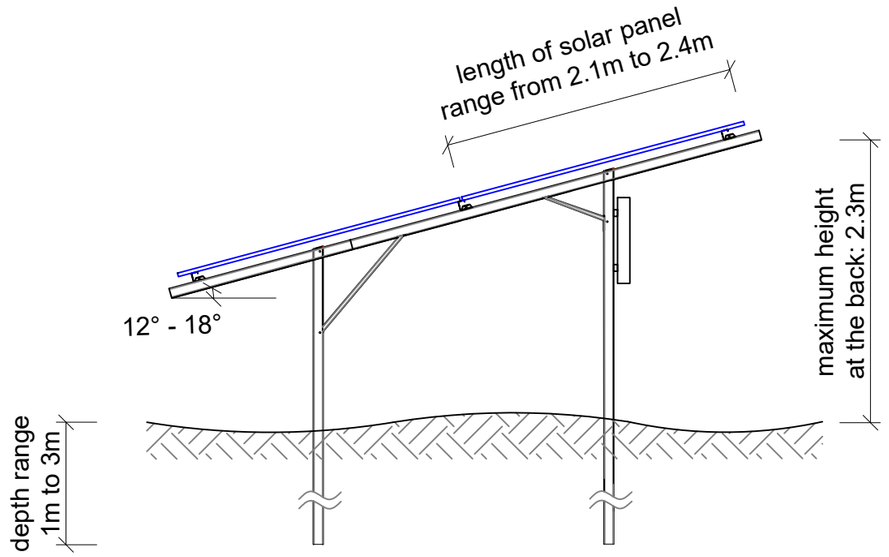
Land flat





Land not flat





The scale of the drawing is only valid for A3 format printing

Project: Botley West Solar Park				Status: Illustrative		
					Date	Name
				Edit	01.07.2025	R. Amdouni
				Check	01.07.2025	H. Trabelsi
A	Created	01.07.2025	R. A			
Id.	Changes	Date	Name			

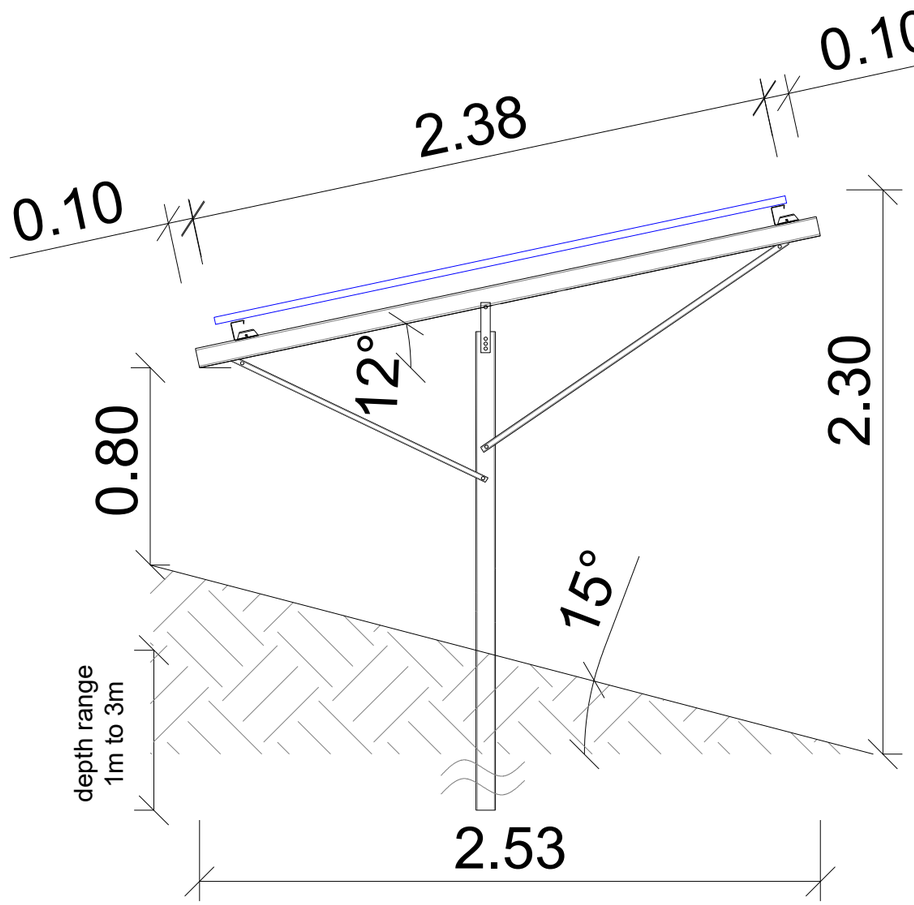
Scale: 1:50 | DIM: m

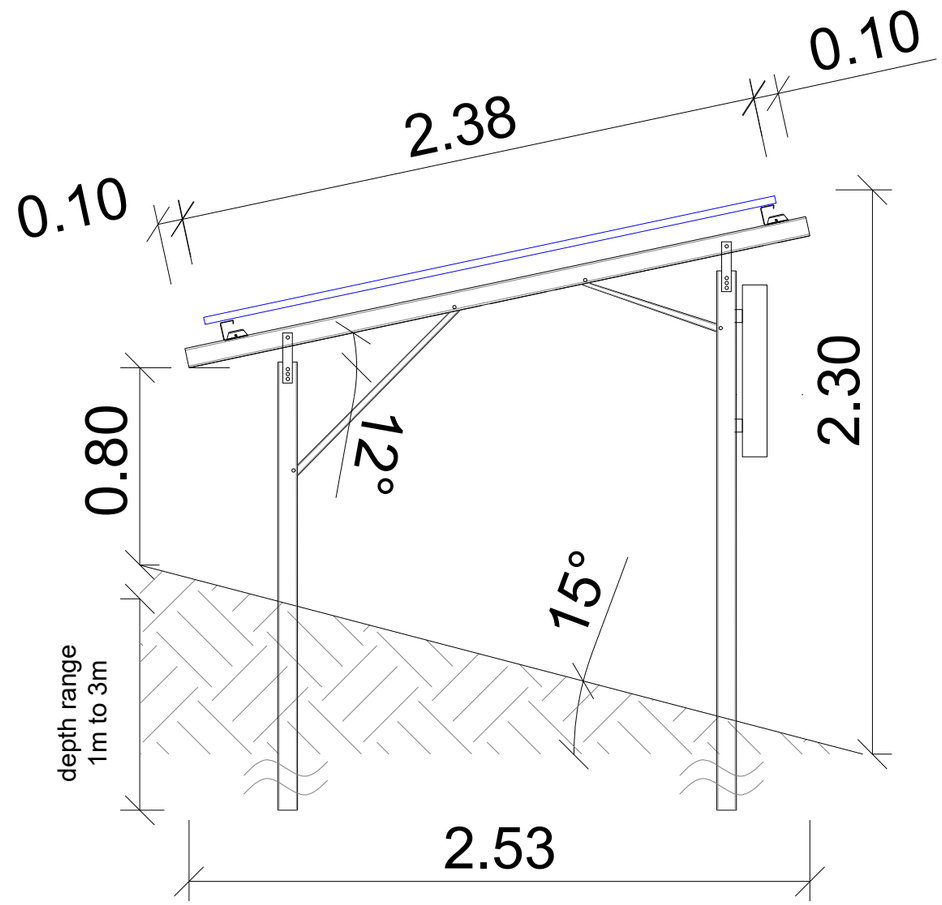
Plan: Q1.1.7 - Illustrative Mounting Structure Plan

Photovolt Development Partners GmbH
Kurfürstendamm 52
10707 Berlin, Germany

Land not flat

Single–row landscape configuration





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Project: Botley West Solar Park				Status: Illustrative		
					Date	Name
				Edit	01.07.2025	A. Ghedira
				Check	01.07.2025	H. Trabelsi
A	Created	01.07.2025	AG			
Id.	Changes	Date	Name			

Scale: 1:25 | DIM: m

Plan

Q1.1.9 - Mounting structure for the North facing slopes in the southern site area: 51°44'29.70"N , 1°20'46.86"W

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