Botley West Solar Farm

Applicant's Responses to Local Impact Reports Submitted at Deadline 1

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1 Introduction

1.1 Purpose of this Document

1.1.1 The purpose of this document is to provide SolarFive Limited's (the Applicant) response to the Local Impact Reports submitted at Deadline 1 of the Examination for Botley West Solar Farm (BWSF) (the Scheme).

1.1.2 The Development Consent Order (DCO) application for Botley West Solar Farm (the Application) was submitted on 14 November 2024 and accepted for Examination on 19 December 2024. Deadline 1 of the Examination was on 4 June 2025.

1.1.3 A total of 189 submissions were submitted to the Examination at Deadline 1. 48 of these were from the Applicant, with 141 being from Interested Parties. There was a total of three Local Impact Reports (LIRs) submitted at Deadline 1. There was a joint Local Impact Report from Cherwell District Council (CDC), Vale of White Horse District Council (VWHDC), West Oxfordshire District Council (WODC) and Oxfordshire County Council (OCC). There were also two separate LIRs from CDC and OCC respectively.

1.2 Structure of this document

1.2.1 This document provides a response from the Applicant to Local Impact Reports submitted at Deadline 1 and is structured as follows:

Table 2.1: Applicant's Responses to Cherwell District Council (CDC) Local Impact Report **[REP1-052]**

Table 0.1: Applicant's Responses to Local Impact Report from Oxfordshire County Council **[REP1-070]**

Table 0.2: Applicant's Responses to joint Local Impact Report from Cherwell District Council (CDC), Vale of White Horse District Council (VWHDC), West Oxfordshire District Council (WODC) and Oxfordshire County Council (OCC) **[REP1-072]**

1.2.2 Submissions received by Interested Parties are presented as verbatim text (unless it has been more appropriate to summarise) and are then responded to by setting out the Applicant's position on the matter at the time of writing.

1.2.3 To increase the conciseness of this document similar points have been grouped together and summarised. The reference number column in the tables below refers to the reference given to the submissions made by Interested Parties.

1.2.4 The documents submitted with the Application are also referenced in this document, using the reference number **[APP/x.y]**, where the last three numbers are the application document number, as set out in the Examination Library.

Table 1.1: List of Interested Parties that submitted Local Impact Reports at Deadline 1

LIR/Examination Reference Number	Interested Party
REP1-052 - Local Impact Report of Cherwell District Council	Cherwell District Council
REP1-070 - Local Impact Report of Oxfordshire County Council	Oxfordshire County Council
REP1-072 - Joint Local Impact Report of Cherwell District Council, Vale of White Horse District Council, West Oxfordshire District Council, Oxfordshire County Council	Cherwell District Council, Vale of White Horse District Council, West Oxfordshire District Council, Oxfordshire County Council

2 Applicant's Responses to Local Impact Reports provided at Deadline 1

2.1 Applicant's Responses to Cherwell District Council (CDC) Local Impact Report [REP1-052]

Table 2.1: Applicant's Responses to Cherwell District Council (CDC) Local Impact Report [REP1-052]

Name	Comment	Applicant's Response	Issues
Cherwell District Council	RESOURCE EFFICIENCY/SUSTAINABILITY In the event that this development is approved, CDC would wish to ensure that the necessary resources (such as the solar panels, cables and fencing etcetera) are sourced as locally as possible. It is observed that commitment 14.14 in the Climate Change chapter **[APP-051]** states that this will be achieved via the Outline Operational Management Plan (OOMP) **[APP-234]**. Table 3.1 of the OOMP lists proposed mitigation/enhancement measures and, in respect of Climate Change, point c. states that the project will be operated to "maximise the use of alternative materials with lower embodied carbon such as locally sourced products". CDC notes that this is also referenced in paragraph 1.10.40 in the Outline Code of Construction Practice Part 1 **[APP-232]** covering Climate Change and, in particular, measures to minimise vehicle trips.	Noted.	Climate Change
Cherwell District Council	REMOVAL OF PART OF THE CENTRAL SITE FROM THE DCO. • Harm to aviation activities associated with London-Oxford Airport (namely the need to preserve emergency landing areas in the event of engine failure after take-off) in conflict with Policy ESD5 of the CLP; CDC estimates that 161ha of solar pv are proposed within Cherwell district which, based on the applicant's assumption of 0.84MW per ha, would generate a total of approximately 135.4MW. The parcel to the east of the A44 would amount to circa 15ha so its removal would result in an estimated reduction of around 12.5MW. Therefore, the Council observes that if the parcel south of London-Oxford Airport were removed from the development the overall energy production within Cherwell from BWSF would still be in the region of 122.5MW; i.e. only just under the 125MW target by 2030 set out in our Solar PV Strategy.	The Applicant is in discussion with the airport on the matter through the SoCG. The SoCG will contain comments and further reporting to address these issues.	Aviation
Cherwell District Council	COMMUNITY BENEFITS Acknowledging that Community Benefits are not a material planning consideration, CDC wishes to reiterate the importance of securing a suitable mechanism for collecting and implementing a community benefit fund and to ensure the creation of a retail energy company to sell part of the energy generated by Botley West at a discounted rate to the local community.	The Applicant has listened to the feedback received during the statutory consultation and read the Relevant Representations. Discussions about the amount and structure of the community benefit fund have been going on for the last twelve months with the LPAs and parish councils. The Applicant has raised the fund to £525 per MW, £440,000 annual contribution. The proposed community benefit offering is set out in paragraph 1.2.20 of the Applicant's Written Summary of Oral Submissions at the Open Floor Hearings (OFH1 & OFH2) [**REP1-018**].	Community Benefits and Impacts
Cherwell District Council	REMOVAL OF PART OF THE CENTRAL SITE FROM THE DCO. • The loss of land identified as Grade 2 quality agricultural land.	Volume 1, Chapter 17 Agricultural Land Use and PRoW **[APP-054]** assesses the ALC of the land within the project. Table 17.17 provides the distribution of the grades surveyed and shows that whilst there is approximately 7.2% of Grade 2 land, spread across the site in irregular shaped and limited areas, the majority of the site predominantly comprises Grade 3 land, 88% comprises Grade 3 land, with the majority of the site comprising lower quality Subgrade 3b land. As Natural England have commented in their written representation, the solar panels could be removed in the future with no permanent loss and the Applicant has committed to the implementation of a soil management plan (Requirement 11 of the Draft DCO **[APP-233]**) to ensure that soil resources are conserved. The Project would therefore lead to the permanent loss of only approximately 5.5 ha of best and most versatile land, which would not comprise a significant loss of this resource.	Agricultural Land Use
Cherwell District Council	REMOVAL OF PART OF THE CENTRAL SITE FROM THE DCO. CDC objects to the erection of solar panels and associated equipment on part of the Central Site; namely the field south of London-Oxford Airport and east of the A44. The development of this parcel of land would result in: • Unrestricted sprawl of a large urban area into the Green Belt in conflict with the NPPF;	The Applicant does not agree with the authority in respect to conflict with this part of the Green Belt. However, the Applicant wishes to draw to the attention of the IP and the ExA that this field is expected to be removed from the Order limits via a second Change request to be made at Deadline 2.	Green Belt

Cherwell District Council	REMOVAL OF PART OF THE CENTRAL SITE FROM THE DCO. • The coalescence of Kidlington and Begbroke in conflict with Policy ESD14 of CLP and saved Policy C15 of the Cherwell Local Plan 1996;	The Applicant does not agree with the authority in respect to conflict with this part of the Green Belt. However, the Applicant wishes to draw to the attention of the IP and the ExA that this field is expected to be removed from the Order limits via a second Change request to be made at Deadline 2.	Planning Policy

2.2 Applicant's Responses to Local Impact Report from Oxfordshire County Council [REP1-070]

Table 0.1: Applicant's Responses to Local Impact Report from Oxfordshire County Council [REP1-070]

Name	Comment	Applicant's Response	Issues
Oxfordshire County Council	As set out in our Relevant Representation (RR) **[RR-0793]**, in principle OCC support proposals for green energy providing there are no significant adverse environmental impacts. OCC recognises there is a climate emergency and that the expansion of solar generating capacity in Oxfordshire is needed as part of the transition to net zero.	Noted.	Climate Change
Oxfordshire County Council	In its current form the proposed development cannot be supported for reasons including: 2.5 Sterilisation of mineral resources. It is felt there has been inadequate engagement on technical matters to date and that a significant amount of further work on the extent of the scheme, the assessment of impacts, and the necessary mitigation is needed in order to make the scheme acceptable.	Please see the Applicant's response to the Joint Local Impact Report **[REP1-072]** regarding sterilisation of minerals.	Ground Conditions
Oxfordshire County Council	in its current form the proposed development cannot be supported for reasons including: 2.7 Lack of clarity on National Grid substation / grid connections. It is felt there has been inadequate engagement on technical matters to date and that a significant amount of further work on the extent of the scheme, the assessment of impacts, and the necessary mitigation is needed in order to make the scheme acceptable.	The Applicant has a bilateral connection agreement with National Grid Electricity Transmission to deliver 840MW electricity to the National Electricity Transmission System. Details of this can be found in the Grid Connection Statement **[APP-019].** In addition, NGET submitted a clear explanation of their plans for consenting and building the new substation at Deadline 1 **[REP1-106]**. NGET will submit a TCPA planning application to Vale of White Horse District Council in 2026. The Applicant has included the NGET substation in its DCO Application as insurance against NGET failing to obtain planning consent on land that they control.	Grid Connection
Oxfordshire County Council	in its current form the proposed development cannot be supported for reasons including: 2.3 Further ecological and arboricultural survey information is required. It is felt there has been inadequate engagement on technical matters to date and that a significant amount of further work on the extent of the scheme, the assessment of impacts, and the necessary mitigation is needed in order to make the scheme acceptable.	Ongoing matters of contention with OCC are as presented in the Statement of Common Ground **[REP1-029]**. It should be noted some surveys are ongoing such as RiverMorph and bat surveys, which will further inform the impacts and mitigation of the Project.	Local Ecology and Nature
Oxfordshire County Council	In its current form the proposed development cannot be supported for reasons including: Significant impact on heritage assets. It is felt there has been inadequate engagement on technical matters to date and that a significant amount of further work on the extent of the scheme, the assessment of impacts, and the necessary mitigation is needed in order to make the scheme acceptable.	The Applicant considers that the assessment of impacts and effects as set out in the submission documents and any subsequent revised versions of such documents is robust and accurate. Further changes to the design of the scheme are set out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2; if accepted these changes will enable avoidance or reduction of impacts on a number of heritage assets.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The setting of designated and non-designated heritage assets, as well as the Blenheim World Heritage Site is related to their landscape context as well as other factors like topography and land use. The OHA consider the proposed development will result in harm to these settings.	A detailed assessment of the likely impacts and effects arising from changes within the settings of heritage assets is presented in ES Appendix 7.5: Settings Assessment **[APP-142]**. A Revision 1 version of this document, with additional information, was submitted at Deadline 2 **[EN010147/APP/6.5]**. The Applicant has presented their assessment of the likely impacts on the OUV of the Blenheim Palace WHS in the Heritage Impact Assessment **[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 assessed level of harm on one of the defined attributes that contribute to the OUV is 'minor negative'.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The OHA consider that the applicant's assessment of the impact on heritage assets is too reliant on the visual link to heritage assets and does not sufficiently consider other links between the site and the heritage assets such as agricultural land use.	Further information on this issue is set out in the Revision 1 version of ES Appendix 7.5: Settings Assessment **[EN010147/APP/6.5]** which was submitted at Deadline 2. The assessment of likely impacts and effects on the historic environment is set out in ES Chapter 7: Historic environment **[CR1-003]**. This includes effects on the overall historic landscape.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The OHA are concerned that the proposed mitigation methods such as hedges around Public Rights of Way will fundamentally change the way heritage assets are appreciated.	The design of the Project seeks to balance the issues regarding new hedges. Whilst these hedges are used to screen views of the solar PV panels and associated infrastructure, it is acknowledged that in some situations this can result in impacts on how heritage assets are experienced and appreciated. Care has been taken within the design process to retain key views towards heritage assets where this is possible. Where it has not been possible, the loss of any views has been included within the assessment of impacts and effects on the heritage assets.	Historic Environment

Joint Local Impact Report of CDC, VWHD, WODC and OCC	The applicant has not yet submitted an Archaeological Evaluation Report. As such an assessment of the significance of any archaeological remains beneath the proposed development cannot be undertaken. OCC will comment on the impact on archaeological assets once an Archaeological Evaluation Report has been submitted by the applicant. It may be the case that further panels need to be removed from the scheme where these would cause harm to significant archaeological remains.	Evaluation reports setting out the results of the programme of trial trenching are currently being prepared. It is anticipated that these reports will be submitted at Deadline 5.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The OHA consider the applicant should: Revisit their assessment of impacts on Heritage Assets within the ES, taking into account all factors which contribute to the setting of a Heritage Asset. Remove panels from the scheme where they cause significant harm to heritage assets or their setting. Revisit their proposed mitigation to ensure it does not impact the way in which heritage assets are appreciated.	The Applicant considers that the assessment of impacts and effects as set out in the submission documents and any subsequent revised versions of such documents is robust and accurate. Further changes to the design of the scheme are set out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2; if accepted these changes will enable avoidance or reduction of impacts on a number of heritage assets.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The OHA are concerned about the impact of the BWSF on the setting of the Blenheim Palace World Heritage Site and the impact that this could have on the Outstanding Universal Value of this asset of the highest significance.	The Applicant has presented its assessment of the likely impacts on the OUV of the Blenheim Palace WHS in the Heritage Impact Assessment **[APP-141]**. This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (**G***uidance 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 assessed level of harm on one of the defined attributes that contribute to the OUV is 'minor negative'. The Applicant notes that in their Relevant Representation **[RR-0398]** and Written Representation **[REP1-0867]**, Historic England does not disagree with the Applicant's assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4 **[APP-141]**), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment **[CR1-003**]. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS. This is reflected in the changes to the Project design set out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2. The Applicant also notes that ICOMOS-UK has made a Relevant Representation in respect of the scheme **[RR-0413]**. ICOMOS-UK is the UK National Committee of ICOMOS (International Council on Monuments and Sites), which has a special role as the official adviser to UNESCO on cultural World Heritage Sites. ICOMOS-UK plays a leading role in implementing the World Heritage Convention 1972 within the UK and promoting best practice in the management of UK World Heritage Sites. The maintenance of the OUV of the UK World Heritage Sites and their settings is one of their key objectives. ICOMOS-UK state that *'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*'.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	In addition to the scale, proximity and massing of the solar farm proposals themselves, the OHA are concerned about the cumulative impact of this with other proposed 40 development within the setting of the WHS, particularly residential development at Woodstock. ICOMOS in their Relevant Representation **[RR-0413]** have expressed concern about the cumulative impact of development within the setting of the World Heritage Site.	An assessment of cumulative effects on the historic environment is presented in section 7.10 of ES Chapter 7: Historic environment **[CR1-003]**. This was undertaken in accordance with the appropriate guidance on Cumulative Effects Assessment as set out in ES Chapter 4: Approach to Environmental Assessment **[APP-041]**.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Offsetting harm to the Outstanding Universal Value against potential benefits through the raising of funding for maintenance is not appropriate to World Heritage properties	The Applicant respectfully disagrees with this comment. Historic England specifically asked that the potential benefits to the Blenheim Palace WHS be set out within the Heritage Impact Assessment **[APP-141]**. These include benefits derived from increases to the Maintenance Fund which would help with the long-term conservation of the World Heritage Property.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Limiting the impact on the setting of the WHS to views and intervisibility however, underrepresents the contribution of the setting to the OUV of the WHS. It is the impact on the landscape character of the surrounding the park as a result of the scale, massing and form of the Solar Farm that the OHA remain concerned about.	The Applicant has presented their assessment of the likely impacts on the OUV of the Blenheim Palace WHS in the Heritage Impact Assessment **[APP-141]**. The assessment is not limited to views and intervisibility as suggested in the LIR; it looks at the wider setting beyond the visible.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	While it is welcomed that the Applicant has provided baseline information on, and an assessment of effects on, historic landscapes (**[APP-131]** paragraphs 1.5.244-259), this is largely divorced from any consideration of the rest of the historic environment. This is particularly apparent with the open agricultural landscapes that form the setting of the Blenheim Palace WHS and Registered Park and Garden. The Applicant is therefore advised to revisit the consideration of historic landscape and make greater use of the evidence available to better understand the contribution of historic landscapes to the significance	The Applicant considers that their assessment of the impacts and effects on the general historic landscape, as set out in ES Chapter 7: Historic environment **[CR1-003]**, is robust and accurate.	Historic Environment

	(and Outstanding Universal Value) of Blenheim – and better articulate how the proposed development will change this. On the face of it, 'minor adverse' impacts to the historic landscape would not appear to do justice to the extent or totality of change within areas of historic character. It is therefore recommended that the approach is disaggregated and deals with significance and change at a character area level. This would provide decision-makers with greater specificity and certainty with regard to impacts.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The OHA have concerns about the impact on the setting of Conservation Areas as a result of the scale, massing and layout of the proposals in proximity to the Conservation Areas and particularly affecting views into and out of the Conservation Areas. For Cherwell, as previously advised, the development area would come into proximity with the boundary of the Begbroke Conservation Area and surround it on two sides. The setting of this conservation area will be altered and there is potential for some harm to the significance of the conservation area through development within its setting as is identified in the ES.	The detailed assessment of likely impacts and effects on Conservation Areas is presented within ES Appendix 7.5: Settings Assessment **[APP-142]**, with further details provided in the Revision 1 version of this document **[EN010147/APP/6.5]** which was submitted at Deadline 2. The Applicant considers that the assessment of impacts and effects as set out in the submission documents and any subsequent revised versions of such documents is robust and accurate. Further changes to the design of the scheme are set out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2; if accepted these changes will enable avoidance or reduction of impacts on the Conservation Areas at Bladon and Begbroke.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The removal of panel arrays from fields to the south of the A4095 and to the north and south of the public footpath that extends to the west of the Bladon could mitigate harmful impacts on the setting of the Conservation Area [Cassington Conservation Area] and significant views from within it.	Further changes to the design of the scheme are set out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2; if accepted these changes will enable avoidance or reduction of impacts on the Conservation Areas at Bladon and Begbroke.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	For the Vale, there is particular concern on the lack of assessment of the relationship of Cumnor Village Conservation Area. No reference is made to the adopted Cumnor Conservation Area Appraisal (Jan 2011) or the way it is described in its landscape context within this document. The transformation of the character of this area from rolling countryside to a solar farm landscape will impact the way Cumnor Conservation Area is understood and experienced from its wider setting, eroding the sense of the settlement as a small hilltop village set in open countryside on the edge of the more suburban area of Oxford City. The area forms an important rural transition between countryside and city and the proposals will erode this along with the contribution it makes to the significance of the designated historic village conservation area. Whilst it could be a low level of impact, not more than Negligible Adverse, it is an adverse impact that should have been more thoroughly examined as the way assets are experienced from the wider context, where there is a direct visual connection or not, does not appear to have been considered	The Applicant's detailed assessment of the likely impacts and effects of the Project on heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment **[APP-142]**. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document *The Setting of Heritage Assets*. The assessment included a scoping exercise through which designated heritage assets were scoped into, or out of, the detailed assessment. The existence of a direct visual connection between the heritage asset and the Project was the principal issue used to decide which designated heritage assets were scoped in and which were scoped out. This does not mean that other issues were not also considered, but visibility is usually the most important. This is noted in paragraph 10 of the 2017 Historic England guidance document which states '*The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset*'. Whilst it is possible for the significance of a heritage asset to be harmed by change within its setting despite a complete lack of intervisibility, this is rare and the outcome in terms of impact and effect is very unlikely to be significant. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach is necessary. Further information on this issue is provided within the Revision 1 version of the Settings Assessment **[EN010147/APP/6.5]** which was submitted at Deadline 2. The Cumnor Conservation Area was scoped out of the detailed assessment presented in ES Appendix 7.5: Settings Assessment **[APP-142]** on the basis that the Project Site does not form any part of the setting of the Conservation Area. The location of the Conservation Area in relation to the Project Site is indicated on Figure 3c in ES Appendix 7.1: Historic environment desk-based assessment **[APP-131]** and is described in paragraphs 1.5.50 – 1.5.52 of that document. This also references the 2011 *Cumnor Conservation Area Appraisal*. The Conservation Area is focused on the historic village core but also spreads out along the main roads as a result of a dispersed pattern of historic farms being located on these routes. The key contributions towards the heritage significance of the Conservation Area come from the historic buildings within the village core, the relationships between these buildings and the spaces which divide and enclose them. The wider rural setting of the Conservation Area makes some contribution towards its heritage significance. Map 4 in the 2011 *Cumnor Conservation Area Appraisal* shows the location and direction of 'Important Views' into and out of the Conservation Area. There are no identified 'Important Views' towards the Project Site, and indeed no part of the Project Site would be visible in views out of the Conservation Area.	Historic Environment

Joint Local Impact Report of CDC, VWHD, WODC and OCC	Hiding the scheme behind hedgerows and enclosing PROW with high hedges will also significantly change the way in which the character of the agricultural landscape can be experienced in the context of the conservation area and listed buildings around the application site and is not necessarily encouraged as mitigation	The design of the Project seeks to balance the issues regarding new hedges. Whilst these hedges are used to screen views of the solar PV panels and associated infrastructure, it is acknowledged that in some situations this can result in impacts on how heritage assets are experienced and appreciated. Care has been taken within the design process to retain key views towards heritage assets where this is possible. Where it has not been possible, the loss of any views has been included within the assessment of impacts and effects on the heritage assets.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	There are three Grade 2 listed structures and buildings on the west side on the edge of Shipton on Cherwell closest to the development site, these include: The Manor and attached outbuildings, Kitchen Garden Walls, and the Church of the Holy Cross. These haven't been specifically considered in the ES.	The 2 km study area for the assessment of impacts arising from changes within the settings of heritage assets was established through consultation with relevant stakeholders, commencing with the Scoping stage of the Environmental Impact Assessment (EIA) including through development following the Scoping Opinion issued by PINS. As set out in paragraph 1.3.1 of ES Appendix 7.5: Settings Assessment **[APP-142]**, designated heritage assets beyond 2 km were considered if they fell within the Zone of Theoretical Visibility (ZTV) for the proposed development and had designed views towards the proposed development or a particular iconic status that could be affected by the proposed development. None of the Grade II listed buildings on the edge of Shipton on Cherwell which are mentioned in the Joint LIR have designed views towards the proposed development or a particular iconic status that could be affected by the proposed development, hence they have not been considered within the detailed assessment presented in ES Appendix 7.5: Settings Assessment **[APP-142]**. The Applicant agrees that the wider settings of the Grade II listed buildings on the edge of Shipton on Cherwell which are mentioned in the Relevant Representation could be affected by the proposed development, but at a distance of more than 2 km the contribution that the setting makes to the heritage significance of the listed buildings would be very limited and therefore the magnitude of impact and the level of effect would be no greater than negligible. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach to assessment is necessary. Further information on this issue is provided within the Revision 1 version of the Settings Assessment **[EN010147/APP/6.5]** which was submitted at Deadline 2.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The OHA are concerned about the impact of proposed development to the south and east of Hordley House on the setting of the Grade 2* Listed Building, particularly as the setting of such assets can be appreciated from the Public Rights of Way network to the south and east.	The Applicant's detailed assessment of the likely impacts and effects of the Project on heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment [**APP-142**]. This assessment was undertaken in accordance with relevant guidance, specifically the 2017 Historic England guidance document *The Setting of Heritage Assets*. The assessment of the likely impacts and effects on the Grade II& listed Hordley House is presented 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 is shown on Figures 2.1b and 2.1c of ES Figures 2.1a-2.4c - Illustrative Masterplan **[AS-020]**. The design has been amended since the consultation on the PEIR with the aim of avoiding or minimising impacts on the heritage significance of Hordley House. The assessment found that the magnitude of impact as a result of the change within the setting of Hordley House would be negligible adverse, resulting in a long-term, reversible minor adverse effect.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	For Cherwell, because of the small size of Begbroke Conservation Area the listed buildings of The Old Rectory (Grade 2), St Michaels Church (Grade 2*) and St Phillips Priory (Grade 2) (located within the conservation area) and Hall Farmhouse (Grade 2) (located outside of the conservation area) will potentially be affected by the development within their setting. The ES only identifies the conservation area and St Michaels Church as being impacted.	The Applicant's detailed assessment of the likely impacts and effects of the Project on heritage assets as a result of change within their setting is presented within ES Appendix 7.5: Settings Assessment **[APP-142]**. Further information on this issue is provided within the Revision 1 version of the Settings Assessment **[EN010147/APP/6.5]** which was submitted at Deadline 2.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The Church of St Bartholemew (Grade 1) which sit outside of the village of Yarnton, are considered susceptible to harm.	The Grade I listed Church of Bartholomew at Yarnton, the Grade II Registered Park and Garden at Yarnton Manor and the Grade II* listed Yarnton Manor were all scoped out of the detailed assessment on the basis that the Zone of Theoretical Visibility (ZTV) developed for the assessment and subsequent site visits indicated that there was no intervisibility between the assets and the proposed development. The Applicant acknowledges that it is possible for the setting of heritage assets to be affected even when there is no intervisibility, but visibility is usually the most important. This is noted in paragraph 10 of the 2017 Historic England guidance document *The Setting of Heritage Assets* which states '*The contribution of setting to the significance of a heritage asset is often expressed by*	Historic Environment

		reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset'. Whilst it is possible for the significance of a heritage asset to be harmed by change within its setting despite a complete lack of intervisibility, this is rare and the outcome in terms of impact and effect is very unlikely to be significant. Given that the purpose of the Environmental Impact Assessment is to identify likely significant effects (rather than all effects), a proportionate approach is necessary. Further information on this issue is provided within the Revision 1 version of the Settings Assessment **[EN010147/APP/6.5]** which was submitted at Deadline 2.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	There are concentrations of Listed Buildings at Bladon, Church Hanborough and Cassington of significant historic and cultural value which the OHA remain concerned about the impacts on them. These include the Grade 2 Listed Church of St Martin at Bladon and Grade 1 Listed Churches of St Peter and St Paul at Church Hanborough and St Peter's at Cassington.	The detailed assessment of likely impacts and effects on listed buildings is presented within ES Appendix 7.5: Settings Assessment **[APP-142]**, with further details provided in the Revision 1 version of this document **[EN010147/APP/6.5]** which was submitted at Deadline 2. The Applicant considers that the assessment of impacts and effects as set out in the submission documents and any subsequent revised versions of such documents is robust and accurate.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Appendix 1: Botley West Solar NSIP Advice on Landscape and Visual and Heritage Matters prepared by LUC May 2025 Historic Environment Review Overall, it appears that contribution of the setting to the heritage assets' significance and the Site's contribution to their setting have been underplayed. Some methodological issues are also highlighted, alongside the unsupported importance of views. The lack of the above elements makes difficult to understand the impact and effects upon the historic environment. The Applicant is therefore requested to: • Revisit the approach taken to non-designated heritage assets to ensure that: – All locally listed buildings or assets otherwise identified have been reviewed and, where of local or greater importance and with the potential to experience effects, these have been scoped into the assessment. – All relevant built heritage assets and historic landscapes • Revisit the methodology applied to the assessment to ensure that statutorily designated assets are afforded a 'high' degree of importance. – In turn, this should address the apparent systemic under-estimation of effects as a consequence of setting change on assets currently assigned 'medium value' (e.g. Grade II listed buildings and conservation areas) – Provide updated assessment outcomes for the relevant assets • Revisit the approach to conservation areas in particular, where screening created by proposed landscape mitigation has been taken into account as a mitigant – which appears to be at odds with the character and significance of most of the affected assets of this nature. • Revisit the approach taken to assessing and describing the effects on historic landscapes – drilling down to the character area level, rather than expressing impacts at the level of the historic landscape as a whole, and providing greater spatial specificity as to where impacts will be concentrated, how this will vary spatially and how this could/should shape design. – It is anticipated that this information will provide important context to inform judgements on where design changes may be required. • With regard to the assessment of impacts on the OUV of the WHS, it is noted that adverse effects are noted. While not judged to be significant, the attention of the host authorities and the Applicant is drawn to the fact that Unesco guidance is clear that any adverse effect to OUV should be considered unacceptable. It is suggested that, taking into account the measures requested above, there may be merit in the Applicant revisiting their WHS HIA to ensure that effects are properly understood – particularly in the context of change to the historic landscape forming the setting of the WHS and contributing to OUV. • Provide the Examining Authority and relevant parties with further information on how heritage matters (particularly the setting of conservation areas) have informed landscape mitigation proposals – and provide an assessment of effects on heritage assets of the same.	Non-listed historic buildings within the agreed study area have been identified through examination of relevant documents. None of these appear on Local Lists, but they are identified within various Conservation Area Appraisals or Neighbourhood Plans. This is set out in paragraphs 1.5.62 - 1.5.64 of ES Appendix 7.1: Historic environment desk-based assessment **[APP-131]**. The detailed assessment of likely impacts and effects on non-listed historic buildings is presented within paragraphs 1.9.126 - 1.9.134 of ES Appendix 7.5: Settings Assessment **[APP-142]**, with further details provided in the Revision 1 version of this document **[EN010147/APP/6.5]** which was submitted at Deadline 2). The assessment found only one non-listed historic building with the potential to experience significant adverse effects. This was Tumbledown Cottage to the north of Cumnor, adjacent to the B4017 Cumnor Road. The Applicant considers that the assessment of impacts and effects as set out in the submission documents and any subsequent revised versions of such documents is robust and accurate. The Applicant respectfully disagrees with the suggestion that all statutorily designated heritage assets should be assigned a 'high' level of value or sensitivity within the assessment methodology. Listed buildings (and Registered Parks and Gardens) are graded I, II* and II, thereby incorporating a tiered approach which would not be necessary if they were all to be considered as having the same level of value or sensitivity. In the case of listed buildings, Grade I is for buildings of exceptional interest and Grade II* is for particularly important buildings of more than special interest. Grade II, which is used for almost 92% of all listed buildings, is for buildings of special interest. This tiered approach is taken forward into national planning policy. Paragraph 5.9.30 of the Overarching National Policy Statement for Energy (NPS EN-1) addresses the issue of harm to '*assets of the highest significance*' which are then identified as Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Grade I and II* listed buildings, grade I and II* Registered Parks and Gardens, and World Heritage Sites. Paragraph 5.9.29 of NPS EN-1 separately addresses the issue of harm to Grade II listed buildings and Grade II Registered Parks and Gardens, which are clearly excluded from the list of '*assets of the highest significance*'. The methodology set out in ES Chapter 7: Historic environment **[CR1-003]** has been developed over many years and has been used for a great number of EIAs including ones prepared in support of Development Consent Orders. As such it has been subject to critical review by key stakeholders numerous times. The Applicant considers that the assessment of likely impacts and effects on Conservation Areas as set out in the submission documents and any subsequent revised versions of such documents is robust and accurate. The design of the Project seeks to balance the issues regarding new hedges. Whilst these hedges are used to screen views of the solar PV panels and associated infrastructure, it is acknowledged that in some situations this can result in impacts on how heritage assets are experienced and appreciated. Care has been taken within the design process to retain key views towards heritage assets where this is possible. Where it has not been possible, the loss of any views has been included within the assessment of impacts and effects on the heritage assets. The Applicant has presented their assessment of the likely impacts on the OUV of the Blenheim Palace WHS in the Heritage Impact Assessment **[APP-141]**. This	Historic Environment

		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 assessed level of harm on one of the defined attributes that contribute to the OUV is 'minor negative'. The Applicant notes that in their Relevant Representation **[RR-0398]** and Written Representation **[REP1-0867]**, Historic England does not disagree with the Applicant's assessment of likely impacts and effects in respect of the Blenheim Place WHS. This applies to the detailed assessment of the likely impacts on the individual attributes that contribute towards the OUV of the WHS (as set out in ES Appendix 7.4 **[APP-141]**), as well as the overall assessment of likely impacts and effects on the historic environment presented within ES Chapter 7: Historic environment **[CR1-003]**. The Applicant continues to work with Historic England towards avoiding or further reducing any impacts on the WHS. This is reflected in the changes to the Project design set out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2.	
Oxfordshire County Council	in its current form the proposed development cannot be supported for reasons including: 2.4 Insufficient landscape and Public Rights of Way (PRoW) mitigation for a scheme of this scale. It is felt there has been inadequate engagement on technical matters to date and that a significant amount of further work on the extent of the scheme, the assessment of impacts, and the necessary mitigation is needed in order to make the scheme acceptable.	The Applicant will continue to liaise with OCC regarding the mitigation proposed for PRoW.	Public Right of Way
Oxfordshire County Council	in its current form the proposed development cannot be supported for reasons including: 2.6 Amendments to the scheme and draft DCO are required. It is felt there has been inadequate engagement on technical matters to date and that a significant amount of further work on the extent of the scheme, the assessment of impacts, and the necessary mitigation is needed in order to make the scheme acceptable.	The Applicant has undertaken both non-statutory and statutory consultation for the Project, including on technical matters and considers that sufficient information has been provided to consultees regarding the nature of the project, assessment of effects, and proposed mitigation. The details of consultation undertaken have been set out in the Consultation Report **[APP-024]**. The Applicant notes that the examination process provides opportunity for OCC to provide further input, including seeking clarification on any specific	DCO Process
Oxfordshire County Council	in its current form the proposed development cannot be supported for reasons including: 2.1 Significant impact on local landscape character and views. It is felt there has been inadequate engagement on technical matters to date and that a significant amount of further work on the extent of the scheme, the assessment of impacts, and the necessary mitigation is needed in order to make the scheme acceptable.	The Applicant consulted with all the local planning authorities also contacted Oxfordshire County Council on landscape and visual matters, please see the consultation report (document reference **[APP-024]**).The Adequacy of Consultation Milestone was discussed in detail with those consultees and the Applicant is committed to proactive and further engagement throughout the Examination process.	Landscape and Visual Impacts

2.3 Applicant's Responses to joint Local Impact Report from Cherwell District Council (CDC), Vale of White Horse District Council (VWHDC), West Oxfordshire District Council (WODC) and Oxfordshire County Council (OCC) [REP1-072]

Table 0.2: Applicant's Responses to joint Local Impact Report from Cherwell District Council (CDC), Vale of White Horse District Council (VWHDC), West Oxfordshire District Council (WODC) and Oxfordshire County Council (OCC) [REP1-072]

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Climate Change / Resilience • The proposed development would make a contribution to renewable energy generation capacity in Oxfordshire and support objectives of achieving net zero in the county by 2050 • The project aligns with the OHA's target of becoming a zero-carbon County by 2050. • Oxfordshire's leading the way target is to achieve a 6% share of the UK solar PV capacity by 2050. This equates to 5,314 MW of installed capacity, resulting in a generation of 5,214 GWh in 2050. • The OHA have concerns about the resilience of the project to climate change and consider that the risks have not been adequately assessed. • The OHA would like to see more detail about how, in particular, the embodied carbon of the panels, their transport from their place of manufacture (which may well be outside the UK) to the site, and the construction traffic will be managed. Mitigation / Improvements • The Applicant should take steps to ensure the development is resilient to the impacts of projected future climate change. • The OHA request that the Applicant provides a Climate Change Resilience Assessment, that responds to the risks outlined in OCC's Climate Risk Assessment, and meets the requirements of NPS EN-1, and shows a broader understanding of potential future climatic risks that could disrupt the solar farm. • Every panel or piece of equipment that has to be replaced over the lifespan of the project due to adverse climate impacts, has an embodied carbon cost, and the efficiency of the equipment will decrease during events such as heatwaves or dry, dusty periods, therefore mitigation through appropriate maintenance and risk assessment should be a priority.	**Resilience of the Project** Increased ambient temperatures as a result of climate change were scoped out as the manufacturing standards for PV modules IEC TS 63126:2020, IEC 62548 and IEC 61215-1:2021 require modules to be functional over a wide range of temperatures, humidity and UV radiation. As such, the potential for small system efficiency losses due to hotter temperatures during the Project's lifetime are not considered to have any potential to significantly affect the lifecycle GHG emissions and thus significantly reduce the environmental effect of the renewable electricity generation. Table 14.6 of the climate change chapter (Volume 1 Chapter 14 **[APP-051]**) confirms additional detail on the justification in line with the planning inspectorate's comment on scoping (Table 14.6 of Volume 1 Chapter 14 **[APP-051]**). Extreme weather events such as storms with high winds are also possible in the existing and future baseline and the Project's design will need to account for this. Manufacturing standards for PV modules (listed above) require consideration for extensive weathering (such as from hailstorms) and extreme thermal fluctuations. As such, extreme weather events are not considered to cause significant environmental effects to the Project. At Deadline 1 the Applicant prepared a document which details the methodology and approach undertaken at the scoping stage concerning potential climate change effects on the Project which were scoped out of the climate change chapter **[APP-051]**. This document is the climate change risk assessment which has been performed by the Applicant relevant to the Project. The document refers to design considerations and standards which design out significant risks due to climatic variations. This is included at Appendix 2 of **[REP1-019]**. **Embodied carbon of transport emissions** 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 including transportation emissions. 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. **Panel efficiency and resilience** 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. 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.	Climate Change
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Section 6: Based on information produced by Distribution Network Operators such as SSEN and made publicly available via the Embedded Capacity Register, the full 840MW of capacity which the proposed development is predicted to generate is not necessarily required in order to meet the solar generation targets set in 'Pathways to Zero Carbon Oxfordshire' (PaZCO) report.	The Planning Supporting Statement (PSS) **[APP-7.1]**, para 2.1.4 sets out the basis for need for solar farms and other forms of low carbon energy infrastructure. The need for all these types of **[energy]** infrastructure is established by NPS EN-1 **[paragraphs 3.3.61 to 3.3.63]** and a combination of many or all of them is urgently required both for energy security and Net Zero. Relative efficiency of one form of renewable energy versus another is not a determinative factor in the provision of renewable energy development. Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The urgent need for CNP infrastructure to achieving our energy objectives, together with national security, economic, commercial and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by the application	Climate Change

Name	Comment	Applicant's Response	Issues
		of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.10.16 The OHA understand the benefits of renewable energy generation and recognise the role that solar PV technology will play both in delivering on net zero targets at a local and national level, and in addressing energy security through local generation. Renewable energy has an important part to play in achieving the county's ambitious net zero targets and we are therefore supportive of renewable energy developments in general. 7.10.17 The project aligns with OCC's target of becoming a zero-carbon County by 2050. As outlined in OCC's Climate Action Framework 2020, the county plans to achieve net zero-carbon status by 2050 through various initiatives, including promoting smart and clean energy infrastructure, supporting solar power usage across the county, and enhancing future resilience. 7.10.18 The development of Botley West Solar Farm will therefore align with OCC's future climate plans and targets of reducing emissions by 50% by 2030 and then reach netzero carbon by 2050.	Noted.	Climate Change
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Resilience of the Scheme 7.10.20 Section 4.10 of the Overarching National Policy Statement for Energy (EN-1) highlights the need for considering climate resilience across projects. 7.10.21 Our observation is that Chapter 14: Climate Change **[APP-051]** places more emphasis on carbon assessment rather than integrating climate resilience throughout the entire project. 7.10.22 The Applicant has scoped out an assessment of the risks to the project from climate change. As stated in Table 14.6 of Chapter 14 of the ES **[APP-051]** (issues scoped out of the assessment) "risks to the Project from climate change are scoped out of the assessment, as these are not considered likely to be significant during the Project's operating lifetime". Table 14.6 further states that "... extreme weather events are not considered to cause significant environmental effects on the Project." 7.10.23 In reviewing ES Chapter 14 **[APP-051]** it is considered that the Chapter lacks sufficient detail to support its exclusion from being assessed as part of the ES, for the reasons stated below: • The applicant did not provide a clear scientific justification for excluding potential climate risks from the assessment. • The OCC Climate Risk Assessment (CRA) 2024 projects an increase in the frequency and intensity of climate hazards. Key hazards include heatwaves, flooding, high winds wildfires and storms. • • Oxfordshire has already experienced storms, with Storm Henk in January 2024 causing significant damage across the county. In other parts of the UK, extremeweather events have impacted solar farms, as in the case of Low Burntoft Solar Farm. In 2021, Storm Arwen disrupted the solar farm, resulting in damage to the solar PV panels. • In addition, projections indicate that future heatwave risk under both 2°C and 4°C climate scenarios will likely increase across Oxfordshire in the 2050s. • The OCC Climate Risk Assessment (CRA) includes an extreme value analysis for extreme heat and flooding across the county, using the RCP4.5 and RCP8.5 scenarios, representing medium and high scenarios, respectively. The analysis for the 2050s, revealed that a 1% annual probability extreme heat event may potentially reach 43.5°C under RCP4.5 and 44.3°C under RCP8.5 by 2055. Furthermore, a 1% annual probability heavy rainfall event could reach 118.8mm under RCP4.5 and 122.2mm under RCP8.5 by 2055. • The solar farm has a 37.5-year lifespan and is anticipated to begin operations in 2028, indicating that decommissioning will occur around 2066. It is likely that, by this time, the county will already be facing extreme climate-related risks, which could potentially affect the Botley West solar farm's operations. • Despite the flood risk assessment for the three sites (Northern, Southern, and Central) concluding that the risk of river flooding and surface water flooding is low, as solar panels and related equipment will be installed in Flood Zone 1 **[less than 1 in 1000 annual probability of flooding (<0.1%)]**, along with other mitigation measures, the OCC CRA indicates that under the extreme 4°C scenario, flood events will increase in frequency with impacts on infrastructure if flood resilience is not considered in design. • The above risks are further supported by the UK's Third Climate Change Risk Assessment (CCRA3) 2022, which underscores that climate change impacts will continue to escalate, even under low climate change scenarios.	**Resilience of the Project** Increased ambient temperatures as a result of climate change were scoped out as the manufacturing standards for PV modules IEC TS 63126:2020, IEC 62548 and IEC 61215-1:2021 require modules to be functional over a wide range of temperatures, humidity and UV radiation. As such, the potential for small system efficiency losses due to hotter temperatures during the Project's lifetime are not considered to have any potential to significantly affect the lifecycle GHG emissions and thus significantly reduce the environmental effect of the renewable electricity generation. Table 14.6 of the climate change chapter (Volume 1 Chapter 14 **[APP-051]**) confirms additional detail on the justification in line with the planning inspectorate's comment on scoping (Table 14.6 of Volume 1 Chapter 14 **[APP-051]**). Extreme weather events such as storms with high winds are also possible in the existing and future baseline and the Project's design will need to account for this. Manufacturing standards for PV modules (listed above) require consideration for extensive weathering (such as from hailstorms) and extreme thermal fluctuations. As such, extreme weather events are not considered to cause significant environmental effects to the Project. At Deadline 1 the Applicant prepared a document which details the methodology and approach undertaken at the scoping stage concerning potential climate change effects on the Project which were scoped out of the climate change chapter **[APP-051]**. The document refers to design considerations and standards which design out significant risks due to climatic variations. This is included at Appendix 2 of REP1-019.	Climate Change

Name	Comment	Applicant's Response	Issues
	• Both the National Policy Statement EN-1 (paragraph 4.10.1) and the December 2024 update to the NPPF explicitly state the need to consider adaptation measures within new development, and demonstrate that daptation and resilience to the impacts of climate change are national priorities. 7.10.24 The Applicant should take steps to ensure the development is resilient to the impacts of projected future climate change, as modelled in the Met Office UK Climate Projections (UKCP18) RCP 8.5 emission pathway, which estimates an increase 4.3°C by 2081-2100. This scenario is likely to result in a variety of climate change hazards from hotter and drier summers, wetter winters, to more intense storm events and prolonged vegetation growth periods. 7.10.25 OCC request that the Applicant provides a Climate Change Resilience Assessment, that responds to the risks outlined in OCC's Council Climate Risk Assessment, and meets the requirements of NPS EN-1, and shows a broader understanding of potential future climatic risks that could disrupt the solar farm.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Maintenance of the Scheme 7.10.26 Table 14.10 (mitigation measures intended to be adopted as part of the Project), item 14.12 of **[APP-051]** states "regular planned maintenance of the Scheme will be conducted to optimise efficiency of the Scheme infrastructure, such as replacement of PV modules and PCS, when required". 7.10.27 We are in support of this, as regular maintenance will not only assist the applicant in identifying potential problems that could affect the solar PVs panels' efficiency but ensure that resilience of the solar farm is enhanced as early as possible. 7.10.28 We would also like the applicant to incorporate a climate risk review into the maintenance process and provide mitigations within the Operational Maintenance Plan **[APP-234]**. While the Plan includes provision for replacement of up to 100% of the panels and assumes their design life of 25 years, this has not considered the likelihood of additional damage from extreme weather events caused by climate change, or the potential for replacement technologies which will undoubtedly become available during the project lifespan to have a higher level of embodied carbon. 7.10.29 Every panel or piece of equipment that has to be replaced over the lifespan of the project due to adverse climate impacts, has an embodied carbon cost, and the efficiency of the equipment will decrease during events such as heatwaves or dry, dusty periods, therefore mitigation through appropriate maintenance and risk assessment should be a priority	The Outline Operational Management Plan **[APP-234]** section 2 - Operational Environmental Management, section 2.2.1 states that maintenance and servicing would include inspection, removal, reconstruction, refurbishment, or replacement of faulty or broken equipment, to ensure the continued effective operation of the Project. The 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. The Project, through implementation of the Operational Management Plan would seek to maximise the effective life of the panels where possible. The 25 year design life of the panels which is referenced in Table 14.9 of the climate change chapter (Volume 1 Chapter 14 **[APP-051]**) is informed by the Environmental Product Declaration for the PV panels. This assumed life is where a typical panels efficiency tends to decrease, however, as mentioned the Project would seek to minimise this decrease in efficiency through the Operational Management Plan. It is not possible to estimate the loss of panels through extreme weather events and as such has not been specified in the assessment in the climate change chapter (Volume 1 Chapter 14 **[APP-051]**). As has been stated above the design of the project is in accordance to various standards for PV panel systems and as such has taken all reasonable precautions to ensure the effectiveness of the panels.	Climate Change
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Greenhouse Gas Reduction Strategy 7.10.33 In previous consultations (Appendix 1, 2 and 3 of OCC's response to action point 17 of ISH1), OCC enquired about the exclusion of decommissioning from the GHG emission assessment. 7.10.34 The applicant considered that and included GHG emissions arising from the decommissioning phase of the solar farm in the assessment. The applicant highlights that some of the carbon emissions associated with this stage come from land use change and transport emissions. Further supporting this, the applicant developed an Outline GHG Reduction Strategy. The Strategy highlights the applicant's plan of reducing carbon emissions from construction, operation and maintenance, and decommissioning. 7.10.35 However, the Outline GHG Reduction Strategy **[APP-216]** makes limited mention of the potential for increased carbon sequestration on the site, which will support the overall carbon reduction strategy as well as Biodiversity Net Gain requirements. 7.10.36 Paragraph 3.2.7 states that "Key consideration has been given to land with high carbon stock such as woodland and peat, and the potential for its disturbance by construction activities. Given that it was determined that no such areas would be disturbed by the Project due to no significant carbon stores were found within the site area. **[…]** Emissions arising from changing land use have not been considered further." 7.10.37 While this may be the case, there are opportunities to simultaneously increase sequestration through appropriate planting and land management, reduce flood risk and minimise other impacts which could subsequently lead to emission of greenhouse gases, such as soil erosion from runoff. 7.10.38 Section 4.2 of the Outline GHG Reduction Strategy **[APP-216]** lacks detail on the actual mechanisms for reducing GHG emissions at each stage of the project. While we accept that this is an outline strategy, and a more detailed GHG reduction plan will be submitted later in the process, paragraph 2.1.4 also states that "The ability to achieve GHG emissions reduction for the project reduces over time. This makes it important that the emissions	The point regarding potential carbon sequestration is noted, however, this contribution would not be a material consideration for the project contribution to mitigating climate change. As has been stated the GHG Reduction Strategy **[APP-216]** paragraph 1.1.7 the "strategy is intended to evolve throughout the design process, building upon the emission reduction opportunities and design measures outlined below, and identifying those to be embedded throughout the procurement and whole life of the Project." As such, additional detail will be provided at a later date as the detailed design develops. Specific reference can be made to measures detailed in paragraph 1.10.40 of the Outline Code of Construction Practices **[APP-232]** concerning waste, transport and dust concerning what has been included within the DCO application. **Embodied carbon of transport emissions** 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 including transportation emissions. 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.	Climate_Change

Name	Comment	Applicant's Response	Issues
	reduction measures and opportunities are considered from the outset or at the earliest practical point." 7.10.39 Given this stance, we would like to see more detail about how, in particular, the embodied carbon of the panels, their transport from their place of manufacture (which may well be outside the UK) to the site, and the construction traffic will be managed. While transport emissions have been indicated as a 'minor' (paragraph 3.2.2) they are emissions which will directly impact the communities surrounding the site and impact Oxfordshire's ability to meet its own transport emissions targets. All possible interventions should be taken to eliminate, as far as reasonably possible, these emissions during the site construction and decommissioning stages in particular.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Possible climate adaptation measures 7.10.40 The OHA acknowledge that some climate adaptation measures are addressed in certain DCO application documents. 7.10.41 Notably, the applicant's commitment to increasing hedgerow areas is commendable. Over 25 km of new hedgerows will be planted, and an additional 22 km of hedgerow reinforcement will be carried out. Hedgerows and woodland corridors serve a crucial role as carbon sinks and green infrastructure components. 7.10.42 Furthermore, the Flood Risk Assessment **[APP-166]** includes several mitigation measures, such as focusing on the development for the Northern, Southern, and Central sites within Flood Zone 1, which has a less than 0.1% annual chance of flooding and all solar panels will be raised to 800mm at the lower leading edge, placing them at least 300mm above any identified surface water flood depths. Moreover, a 25% climate change allowance will be applied, and the Conceptual Drainage Strategy **[APP-167]** contains drainage measures to contain surface water runoff. 7.10.43 Further adaptation measures suggested for inclusion are provided below.	Noted.	Climate Change
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Community Energy & Just Transition 7.10.44 Delivering a just transition to net zero is an essential part of OCC's net zero strategy and is a key intended outcome of the PaZCO ONZRMAP. Extremely large schemes like Botley West Solar Farm leave less opportunity for communities to develop their own locally owned energy schemes, which remains a crucial part of delivering a just transition. The Clean Power 2030 Plan, PaZCO and the forthcoming Local Area Energy Plan for Oxfordshire consider equity and fairness as part of their overarching frameworks, and the delivery of large schemes such as Botley West will have an impact on a just transition without due consideration, and if replicated at a similar scale across the county.	The Applicant acknowledges the need for just transition - an inherent part of the DCO process is the opportunity for community input, which to date has shaped the Project, as summarised in the Consultation Report **[APP-024]**, including on a Community Benefit Fund. There is also ongoing opportunity for input through this Examination process. Given the urgent need for renewable energy infrastructure and in line with the Government's emissions reductions targets, there remains a shortfall in the generation of solar for achieving these targets and future opportunity for community-developed and locally owned energy schemes, in addition to the Project. Utility scale solar will play a critical role in delivering on the Government's emissions reductions targets.	Climate Change
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Climate Change Resilience Review 7.10.45 We suggest that a separate section within the ES **[APP-051]** should be dedicated to Climate Change Resilience Review, that way it is clear about nature of climate hazards that could potentially impact the construction, operation and maintenance (O&M) and decommissioning stages. Below, we highlight some potential risks associated with each of these three stages: • During construction stage, workers could experience delays in accessing the project site due to extreme weather events, health and safety risks to workers during severe weather events and potential damage to materials, buildings and roads. • During O&M, there is a possibility of increased frequency and severity of extreme weather events, such as storm events and heatwaves, leading to damage toequipment and site access roads. PV panels could also decrease in efficiency when temperatures rise above 25 degrees (IEA, 2022). Any rapid shift from freezing to hot temperatures could result in cracks to solar equipment and affect performance. In cases of flooding, solar equipment, like inverters and batteries, could be exposed to water and suffer damage. • During the decommissioning phase, anticipated around 2066, there is a likelihood that the climate hazards discussed previously and outlined in the OCC Climate Risk Assessment and predicted by the UK CCRA3 will be evident, exhibiting heightened impacts. Considering the projections of extreme climate conditions in the 2050s, there is a possibility that the decommissioning process may be impacted by these hazards.	Increased ambient temperatures as a result of climate change were scoped out as the manufacturing standards for PV modules IEC TS 63126:2020, IEC 62548 and IEC 61215-1:2021 require modules to be functional over a wide range of temperatures, humidity and UV radiation. Extreme weather events such as storms with high winds are also possible in the existing and future baseline and the Project's design will need to account for this. Manufacturing standards for PV modules (listed above) require consideration for extensive weathering (such as from hailstorms) and extreme thermal fluctuations. As such, extreme weather events are not considered to cause significant environmental effects to the Project. At Deadline 1 the Applicant prepared a document which details the methodology and approach undertaken at the scoping stage concerning potential climate change effects on the Project which were scoped out of the climate change chapter **[APP-051]**. The document refers to design considerations and standards which design out significant risks due to climatic variations. This is included at Appendix 2 of **[REP1-019]**.	Climate Change
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.10.46 We also propose that the applicant should provide the following additional climate adaptation measures within various DCO application documents as appropriate: • Given the projection of worsening heatwaves, cooling techniques such as reflective coatings and improved ventilation can help maintain optimal solar PV panels temperatures, as can the use of heat-resistant solar PV cells. • Regular cleaning to remove dust/soiling is important as it can potentially reduce PV panel efficiency and output. Increased routine panels inspection and performance monitoring is also recommended to maintain the normal PV	The Applicant has prepared a document (Ref Appendix 2 of the ISH1 Written Summary') which details the methodology and approach undertaken at the scoping stage concerning potential climate change effects on the Project which were scoped out of the climate change chapter **[APP-051]**. As such, no adaptation or mitigation measures beyond those included within the climate change chapter **[APP-051]** are proposed. The Applicant notes the Council's points concerning potential adaptation measures and will consider the feasibility of such at the detail design stage.	Climate Change

Name	Comment	Applicant's Response	Issues
	cells range of between 400 - 800 nanometre wavelength (GO-Science, 2023). • Designing resilient solar panels with better mountings and sensors, and associated equipment on-site is essential to address extreme weather conditions. • Considering the predominantly cloudy conditions in the UK, which may impact PV panel efficiency, the applicant should instal higher-rated solar PVs panels with greater efficiency. • Drainage maintenance to avoid blockage of culverts and drains. • Ensuring that the road surface and pavements are resilient to the full temperature range. • Careful selection of planting dates and survival of the planted hedgerows and trees.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.10.47 Finally, we request additional clarity on the greenhouse gas implications of the transport panels from their place(s) of manufacture to the site, and more detail on the mechanisms to reduce emissions from construction transport and maximise on site carbon sequestration.	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 including transportation emissions. 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	Climate Change
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Socio-economic • The proposal will provide employment during construction and decommissioning and people residing in Oxfordshire who may be employed during these phases of development is potentially positive. However, this is only temporary. Employment during operation is considered to have neutral impact on the local economy. The proposed development will provide employment during construction and decommissioning. The ES suggests 25% of these jobs will be to people living outside Oxfordshire. An outline Skills and Employment Plan has been produced to ensure employment opportunities are available to local people. People residing in Oxfordshire who may be employed during construction is potentially positive and may help local businesses, either because they are directly involved in construction or providing accommodation and supporting services to the 25% of workers temporarily resident in the area. However, this is temporary and so the development is likely to have a potentially neutral impact once completed. The assessment indicates that the most significant socio-economic benefits (moderate beneficial) are in relation to reductions in unemployment during the construction and decommissioning phases of the proposed development. The applicant's calculations indicate a net gain of 191 full time equivalent jobs during the construction phase of the project which will be valuable to the local economy. The applicant's assessment indicates that a total of 336 direct and indirect FTE jobs will be created during the operational and maintenance phases of the project, but taking account of displacement (people moving from other roles) and leakage (people taking up jobs from outside the project area) as well as replacing jobs lost from agriculture, the net total jobs created by the Project over the operational phase would, therefore, equate to circa 18 direct local FTE jobs. • Tourism is a significant contributor to the local economy, with the Cotswold National Landscape and Blenheim Palace. The proposed development has the potential to negatively impact both. Mitigation / Improvements The OHA wish to highlight the importance of the tourism sector to the local economy and wish to ensure that any impacts arising from the Botley West Solar Farm development are minimised. Blenheim Palace World Heritage Site alone significantly benefits the local economy through tourism, employment and local spending. Losing World Heritage Site Status could have a significant negative economic impact, through diminished reputation and reduced tourism. The applicant recognises the important links between the landscape and heritage of the project area and the local tourism offer, as well as recognising that changes to the natural landscape could impact on the appeal to visitors. The impact on the visitor economy is predicted to be or a regional spatial extent and long-term continuous duration. Benefits from Business Rates are potentially neutral as they relate to the solar farm site only. Once the development is complete it is considered the overall impact of the proposal will be neutral.	The Socio Economics ES Chapter **[APP-052]** shows that unemployment will reduce and economic output will increase. It is estimated that 424 direct FTE jobs will be created in the local travel study area across all phases. The ES Chapter calculates £17m of Gross Value Added (GVA) for the Study Area during the construction phase, £64.7m during the operation phase, and £17m during the decommissioning phase. The Outline Skills, Supply Chain & Employment Plan **[APP-218]** also states intentions for the Applicant to work with local suppliers to procure products and services where possible. The Applicant will build upon the relationships formed with Thames Valley Chamber of Commerce and OxLEP to help facilitate this. The Outline Skills, Supply Chain & Employment Plan **[APP-218]** also states the intent to engage with local residents through 'Local Recruitment' initiatives as well as 'Apprenticeships' and 'Other Workforce Training'. Overall the Project will have significant business economic and resident benefits.	Socio economics
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.11.5 The proposed development will provide employment during construction and decommissioning. The ES suggests 25% of these jobs will be to people living outside Oxfordshire. An outline Skills and Employment Plan has been produced to ensure employment	The Socio Economics ES Chapter **[APP-052]** shows that unemployment will reduce and economic output will increase. It is estimated that 424 direct FTE jobs will be created in the local travel study area across all phases.	Socio economics

Name	Comment	Applicant's Response	Issues
	opportunities are available to local people. People residing in Oxfordshire who may be employed during construction is potentially positive and may help local businesses, either because they are directly involved in construction or providing accommodation and supporting services to the 25% of workers temporarily resident in the area. However, this is temporary and so the development is likely to have a potentially neutral impact once completed. 7.11.6 The assessment indicates that the most significant socio-economic benefits (moderate beneficial) are in relation to reductions in unemployment during the construction and decommissioning phases of the proposed development. The applicant's calculations indicate a net gain of 191 full time equivalent jobs during the construction phase of the project which will be valuable to the local economy. The applicant's assessment indicates that a total of 336 direct and indirect FTE jobs will be created during the operational and maintenance phases of the project, but taking account of displacement (people moving from other roles) and leakage (people taking up jobs from outside the project area) as well as replacing jobs lost from agriculture, the net total jobs created by the Project over the operational phase would, therefore, equate to circa 18 direct local FTE jobs. 7.11.7 Landscape is an important part of the tourism offer in the local area and, as such, any changes to the natural landscape could impact significantly its appeal. In addition, tourism in the area provides an important contribution to the local economy, providing approximately 36,969 jobs in 2022 and generating a total tourism value of £2.17 billion (Experience Oxfordshire 2022). 7.11.8 The OHA wish to highlight the importance of the tourism sector to the local economy and wish to ensure that any impacts arising from the Botley West Solar Farm development are minimised. 7.11.9 The Local Impact Report has considered in earlier chapters how the scheme will likely result in negative impacts to landscape and visual resources, including impacts of on public rights of way and long-distance trails, and the historic environment and cultural heritage. These components of the natural, built and historic environment are key attractors to people wishing to visit the area and underpin the tourism industry in this part of Oxfordshire. Any threats to the integrity of these assets or negative impacts arising from the scheme could substantially impact local tourism and its value to the local economy. Blenheim Palace World Heritage Site alone significantly benefits the local economy through tourism, employment and local spending. Losing World Heritage Site Status could have a significant negative economic impact, through diminished reputation and reduced tourism. 7.11.10 The applicant recognises the important links between the landscape and heritage of the project area and the local tourism offer, as well as recognising that changes to the natural landscape could impact on the appeal to visitors. The impact on the visitor economy is predicted to be or a regional spatial extent and long-term continuous duration. 7.11.11 Benefits from Business Rates are potentially neutral as they relate to the solar farm site only. Once the development is complete it is considered the overall impact of the proposal will be neutral.	The ES Chapter calculates £17m of Gross Value Added (GVA) for the Study Area during the construction phase, £64.7m during the operation phase, and £17m during the decommissioning phase. The Outline Skills, Supply Chain & Employment Plan **[APP-218]** also states intentions for the Applicant to work with local suppliers to procure products and services where possible. The Applicant will build upon the relationships formed with Thames Valley Chamber of Commerce and OxLEP to help facilitate this. The Outline Skills, Supply Chain & Employment Plan **[APP-218]** also states the intent to engage with local residents through 'Local Recruitment' initiatives as well as 'Apprenticeships' and 'Other Workforce Training'. The Socio Economics ES Chapter **[APP-052]** evaluates 'Change in Visitor Economy'. It recognises potential disruption to short-term accommodation businesses due to lower visitor numbers, particularly during construction. It evaluates the effect on the tourism economy by contextualising footpath user survey data to total Oxfordshire visitor numbers and found that the impact would effect only 0.01% of Oxfordshire visitors. Overall significance of effect across all phases is not significant. Overall the Project will have significant local and regional economic benefits for both residents & businesses.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.11.12 The ES contains Chapter 15 Socio Economic. It is considered the ES contains adequate information for the Examination Authority to assess the impact of the proposal on socio-economic issues. 7.11.13 The DCO (Sch2 Req13) requires skills, supply chain and employment plans to be submitted to and approved by relevant planning authorities and so OHA can consider the impact on residents and the Oxfordshire economy.	The Outline Skills, Supply Chain & Employment Plan **[APP-218]** also states intentions for the Applicant to work with local suppliers to procure products and services where possible. The Applicant will build upon the relationships formed with Thames Valley Chamber of Commerce and OxLEP to help facilitate this. The Outline Skills, Supply Chain & Employment Plan **[APP-218]** also states the intent to engage with local residents through 'Local Recruitment' initiatives as well as 'Apprenticeships' and 'Other Workforce Training'.	Socio economics
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Waste and Resources • The Outline Site Resources and Waste Management Plan **[APP-233]** does not include the details of the number of wastes that will arise from the decommissioning phase. • ES Chapter 18 **[APP-055]** does not adequately consider alternatives to waste management methods further up the waste hierarchy. • The ability of the applicant to demonstrate that they can dispose of waste is fundamental to any planning decision. As such OCC as the Waste Authority needs the applicant to demonstrate that the quantity of waste expected to be produced can be disposed of both through the operational and decommissioning phases. • The quantity of waste at decommissioning stage will be substantial and the Minerals and Wastes Authority need to know the quantities of waste to be expected to be able to plan for the disposal of the waste in future Minerals and Waste Local Plans. Mitigation / Improvements	The Applicant has responded to these comments in the sections below.	Waste and resources

Name	Comment	Applicant's Response	Issues
	• OCC as the Waste Planning Authority require more detailed projections of waste arisings from the development and a clear plan for the removal and management of the waste within the applicants outline Code of Construction Practice **[APP-233]** and Outline Decommissioning Plan **[APP-236]**.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.14.5 It is noted the design of the Project predominantly uses prefabrication. This reduces the generation of construction waste on site with waste produced during the manufacture of the solar PV units, mounting structures and cabling. 7.14.6 Waste Electrical and Electronic Equipment (WEEE) including photovoltaic panels from supporting electrical infrastructure generated during the operation and decommissioning phases will be recovered and recycled by an authorised processor as required by the WEEE Regulations 2013. 7.14.7 An Outline Site Resources and Waste Management Plan **[APP-233]** has been prepared and sets out the estimated types and quantities of waste that would be generated during the construction process, together with measures for how the waste will be managed. This does not include the details of the number of wastes that will arise from the decommissioning phase. 7.14.8 The applicant has also submitted an outline decommissioning plan which states that waste from decommissioning will be disposed of in line with the waste hierarchy **[APP-236]** paragraph 2.1.2).	7.14.5: The Applicant confirms that the Project design will predominantly use prefabrication. This design approach reduces the generation of construction wastes (e.g. from offcuts, surplus materials etc) and wastes during decommissioning. 7.14.6: The Applicant confirms that damaged and replacement photovoltaic panels during the operation phase and during decommissioning will 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. 7.14.7: The Applicant confirms that the Outline Site Resources and Waste Management Plan **[APP-233]** relates to the management of waste during the construction phase of the Project and therefore, does not provide details on waste from the decommissioning phase. The types and quantities of waste that will be generated from decommissioning of the Project will be set out in the Decommissioning Waste Management Plan (as set out in the Outline Decommissioning Plan **[APP-236]**) 7.14.8: The Applicant confirms that waste generated during the decommissioning will be managed in accordance with the waste hierarchy and the Best Available Treatment, Recovery and Recycling Techniques as set out in the Outline Decommissioning Plan **[APP-236]**.	Waste and resources
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.14.9 In respect of ES Chapter 18 – Waste and Resources **[APP-055]**, the potential impacts as set out in table 18.23 (maximum design scenario considered for the assessment of potential impacts) only considers the reduction in landfill capacity; it does not consider alternatives to waste management methods further up the waste hierarchy.	7.14.9: The impacts set out in Table 18.23 of ES Chapter 18 (APP-055) are line with those set out in the IEMA's Guide to Materials and Waste in Environmental Impact Assessment (IEMA, 2020). Landfill is a finite resource: the disposal of waste from the Project to landfill represents the maximum design scenario for the purpose of the assessment. The Applicant has committed to minimise the volume of waste and to manage waste in accordance with the waste hierarchy principle as set out in the Outline Site Waste Management Plan, which forms part of the Outline Code of Construction Practice and is secured as a requirement of the draft DCO.	Waste and resources
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.14.10 The mitigation measures in table 18.24 (mitigation measures to be adopted as part of the Project) states that the Outline Site Resources and Waste Management Plan includes targets to divert waste from landfill. This seems out of step with table 18.23.	7.14.10: The Applicant notes that for the purpose of the assessment it is assumed that waste generated by the Project will be sent to landfill as this presents the maximum design scenario. However, the Applicants has committed to managing waste in accordance with the waste hierarchy principle, which includes diverting waste from landfill. Targets have been set to allow performance to be monitored in the future.	Waste and resources
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.14.11 This section also states that an Operational Waste Management Plan will be agreed with the Waste Planning Authority prior to development commencing. In addition, there is also to be a Decommissioning Plan to be provided prior to commencement setting out more detail on waste. However, the disposal of the waste produced is fundamental to the planning decision as the applicant needs to demonstrate that the quantity of waste that will be produced is capable of being disposed of. Equally, given the potential quantity of waste at decommissioning stage, the development may have serious implications on the planning of waste sites within the County in future Minerals and Waste Plans. As such this information should be provided prior to any consent being granted.	7.14.11: The Applicant notes that Requirement 12 of the draft DCO **[REP1-005]** states that prior to the final commissioning for any part of the authorised development, an operational management plan will be agreed by the relevant planning authority, in consultation with the planning waste authority and relevant highway authority. The Outline Operational Management Plan **[APP-233]** explains that the Applicant will establish a list of authorised reprocessors (in accordance with the WEEE Regulations 2013) prior to the operational phase of the Project and that the list will be kept up to date during operation. The Applicant will engage with Oxfordshire County Council during the establishment and maintenance of the list. The Applicant notes that there are existing facilities within the UK that currently recycle photovoltaic panels. The number of recycling facilities is likely to increase with the expansion of solar power. The number of panels to be replaced during the operation and decommissioning phases of the Project represent a proportion of the national figure. With this in mind, the Applicant considers there will be facilities in place to manage this waste stream.	Waste and resources
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.14.12 The proposal does not include a proposal for a waste management facility, and so there are no policies within the Minerals and Wastes Local Plan that directly apply to the application, but the amount and type of waste that would be created by the development would require waste management in the future. This would be a large amount of additional waste that would need to be planned for in future Waste Local Plans. The waste impact of the site is therefore a major negative one	7.14.12 The Applicant refers to its response to REP1-072 and will ensure ongoing engagement with Oxfordshire County Council regarding the management of waste from the operation and decommissioning phases of the Project.	Waste and resources
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO 7.14.13 Site Resources and Waste Management Plans (SRWMP) are implemented through Requirement 11 in the DCO **[APP-015]**. Paragraph (3) of Requirement 11 states that the Site Resource and Waste Management Plan to be submitted must be substantially in accordance with the outline Code of Construction Practice **[APP-233]** (which contains the Outline SRWMP). Likewise, Paragraph (4) of Requirement 14 states that any Decommissioning Plan submitted to the Local Authorities must be substantially in accordance with the submitted	7.14.13: The Applicant notes the comment. 7.14.14: ES Chapter 18: Waste and Resources **[APP-055]** and the Outline Code of Construction Practice **[APP-232 and 233]** set out the principles and commitments of how waste from the Project will be managed. The Applicant notes that detailed design information will be used to determine the detailed quantities and types of waste that will be generated by the Project. The identification of specific waste management facilities that will be used by the Project are subject to confidential commercial discussions and therefore, are not included	Waste and resources

Name	Comment	Applicant's Response	Issues
	Outline Decommissioning Plan **[APP-236]**. 7.14.14 As outlined above the OHA, particularly OCC as the Minerals and Waste Planning Authority, have concerns about the adequacy of the submitted outline plans in relation to waste disposal and the volume of waste that will be produced and how it will be disposed. The Minerals and Wastes Authority would expect to see more detailed projections of waste arisings and a clear plan for the removal and management of the waste produced within the Environment Statement and outline plans. Waste management is a material consideration and should be addressed prior to determination.	within the ES or DCO application documents. However, the Applicant confirms that facilities are already established and in operation to manage the key waste streams from the Project.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Ground Conditions • The proposal largely comprises agricultural land which is not considered to represent a potentially significant source of contaminants of concern. • The potential for new contaminants during construction via spillages or leakages from plant or fuel storage in compounds. • The potential for ground contamination if the project is not decommissioned properly and elements such as piling spikes remain. Mitigation / Improvements • None.	The impact of new contaminants on soils and groundwater is assessed within Chapter 11 of the ES **[APP-048]**. Commitment 11.5 to prepare a Pollution Prevention Plan is set out in Outline CoCP **[APP-232]**. The detailed CoCP will include a full Pollution Prevention Plan. Decommissioning of the Project will be undertaken in line with the Outline Decommissioning Plan **[APP-236]**. All above ground infrastructure will be removed. All below ground infrastructure, which are not practicable to remove without major disturbances, will be cut to 1m below the surface to enable future ploughing. All piles are to be removed.	Ground Conditions
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Mineral Safeguarding • Several of the parcels proposed for the development fall within a Mineral Safeguarding Area for sand and gravels. In terms of these parts of the application site, policy M8 of the Core Strategy applies. The site has not been allocated in a Local Plan or Neighborhood Plan and there is no proposal to extract the mineral prior to the development taking place. • The Applicant's MRA calculates the lost mineral to be 3.58 million cubic metres which at a conversion rate of 1.5 tonnes per cubic metre would be 6.87 million tonnes. The amount of minerals the proposed development would sterilise would be equivalent to Oxfordshire's seven-year supply. • The amount of sand and gravel that would be prevented from being worked therefore is considered significant and would come at a time when central government are prioritising house building and growth which will need the adequate supply of sand and gravel to meet demand. • This is contrary to The Minerals and Waste Local Plan for Oxfordshire. • Areas of the proposed development which fall within Minerals Safeguarding areas should be removed from the scheme.	It should be noted that the MRA appraisal submitted and associated comments in the ES chapter are based upon the adopted Minerals and Waste Local Plan 2017 which as stated on the OCC website 'The Oxfordshire Minerals and Waste Local Plan Part 1 (Core Strategy) remains in place as part of the Development Plan until it is replaced by the New Minerals and Waste Plan' and provides the planning strategies and policies for the development that will be needed for the supply of minerals and management of waste in Oxfordshire over the period to the end of 2031. For the purposes of the MRA, the adopted Minerals and Waste Local Plan 2017-2031 has been reviewed as this is the currently available adopted policy document. The forecast for future demand for sand and gravel aggregates over the duration of the Project cannot be quantified and will be subject to many economic and political variables. Previous correspondence with the OCC minerals team post PEIR submission identified a small number of queries that were responded to in the revised MRA submitted as a Technical Appendix to the ES chapter. The email response received from OCC dated 22/02/24 again reiterated that they had approved the production of a new plan to 'replace the adopted Oxfordshire Minerals and Waste Local Plan Part 1 – Core Strategy, and also in place of the Oxfordshire Minerals and Waste Part 2 – Site Allocations which had been in production. No new plan has yet been produced, so the Oxfordshire Minerals and Waste Local Plan Part 1 – Core Strategy remains the current Development Plan Document'. It is acknowledged in the Oxfordshire Minerals and Waste Local Plan Part 1 – Core Strategy that one of the key strategic issues is 'The contribution towards meeting overall aggregate supply requirements in Oxfordshire that could be made by secondary and recycled aggregate and how that contribution could be best secured.' The stated vision and objectives for minerals in Oxfordshire at the end of the time period of the Local Plan is that by 2031 that there will be a 'sufficient supply of aggregate materials available to meet the development needs of the county with a world class economy, and make an appropriate contribution to wider needs', provided as a priority from secondary and recycled aggregate materials where practicable. This principle is supported by the council, and Policy M1 devised to support the maximising of the contribution from recycled and secondary sources in Oxfordshire through provision of appropriate recycling facilities to achieve this. In conjunction, the strategy aims to increase the recycling of construction, demolition and excavation wastes to 70% by 2031. Given the contents of NPPF (2024) it is assumed that these principles, as included in the current Local Plan will form the basis of mineral strategy for future revisions to the plan beyond 2031. It is envisaged that throughout the period of operation of the Project that the use of recycled aggregates within the county from former construction, demolition and excavation wastes will be promoted further in preference to the use of primary aggregates. This is in accordance with the vision of the 2017-2031 Local Plan and the NPPF which encourages the reuse and recycling of local material including secondary aggregates where these can be used satisfactorily and realistically instead of primary minerals as a preferred means of aggregate supply. Although the possible requirement for future use of aggregate reserves cannot be predicted through the period of operation of the Project, the commitment in NPPF and that published by the Council that levels of aggregate demand should be met wherever possible from secondary sources or recycled materials would suggest that future demand from primary sources is likely to reduce further during the operational period of the Project. Notwithstanding this, the latest Local Aggregate Assessment (LAA) for Oxfordshire was issued in 2024 (and covers the calendar year of 2023) identifies that at the end of 2023, total permitted reserves of Sharp Sand and Gravel in Oxfordshire were 7.693 mt. Using the latest Aggregates Provision Rate figures of 0.986 mtpa, this gives a landbank of 7.8 years and	Ground Conditions

Name	Comment	Applicant's Response	Issues
		therefore is above the minimum threshold set by the NPPF for sand and gravel. The LAA also identifies that there were four outstanding planning applications for sharp sand and gravel quarries, which if are consented, would contribute to the permitted reserves and increase the available landbank. It states that to meet requirements of the currently adopted Core Strategy, a further 2.649 million tonnes is required to cover the Plan period to 2031. This could be sought from the pending planning applications for new sites in the county. It is also noted that the New Minerals and Waste Plan to be adopted in 2026, will provide an up-to-date requirement for sand and gravel in the county, and as part of that process, a call for sites was undertaken. It is understood that the land potentially temporarily sterilised by the proposed development was not included as part of the call for sites process and therefore, it is considered that to meet the requirements of the new plan, this will be secured through the identified sites in the process and pending applications. The c. 3.8 million m^3 of material currently stated in the response does not take into account the impact of buffers which are set out in the report. This is an overestimate of what would actually be present beneath the areas that would be temporarily sterilised by the development, and therefore would not provide up to a 7-year landbank worth of resource. Additionally there is an estimated approx. 2.8 million m^3 of overburden material, comprising Alluvium, that would need to be removed / transported prior to extracting the safeguarded sand and gravel. Given the current supply of aggregate meets the minimum required landbank, it is not considered that it would be economically viable at current market to extract. It would only be considered viable when there is a deficit of material and this was a location of preferred interest / search for mineral extraction, to remove comparable volumes of overburden to resource. The extent of the MSAs are extensive and there are several locations across the county that could be identified for extraction to maintain supply prior to decommissioning of this solar farm. Planning permission and relevant permits would need to be sought for any prior extraction application, along with the establishment of a processing site and / or significant conveyor systems to the nearest operational quarry, some 500 m away. As an example, for a site elsewhere in the UK with current extraction rates of approx. 1,000,000 m3, the timescale for completion is currently estimated at between 7 to 9 years, which includes restoration and some phases of the operation being undertaken in parallel with each other (it does not include the time required to seek permission for the mineral operation). This will significantly increase the timescales of the Project which will deliver significant benefits through the generation of renewable energy. The benefit of the Project far outweighs any limited temporary impact the Project would have upon the safeguarded mineral resources. When the operational phase ends, the solar farm will require decommissioning. All PV modules, BESS containers, mounting poles, inverters transformers and switchgear would be removed and recycled or disposed of in accordance with good practice and market conditions at the time. Therefore, the site will be restored to its current condition, allowing the ability to extract the minerals if needed after the operation of the Project. The proposed works are not directly interfering with or sterilising the identified potential of the mineral reserves, given the works proposed are predominantly above ground, after which time the site would be returned to its current condition and use. The Project would therefore not permanently sterilise any mineral resources should they exist. 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.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.6.6 Chapter 11 of the ES **[APP-048]** considers impacts on ground conditions from construction and operation. It is considered the ES contains adequate information for the ExA to assess the impact of the proposal on soil and groundwater contamination, surface water contamination, future land users and off-site land users.	Noted.	Ground Conditions
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.6.8 The inclusion of mitigation in the form of further investigation/remediation and a watching brief and procedures to be followed in the event of unexpected contamination being encountered as per the suggested requirements in CDCs S42 response to the applicant on 08 February 2024 is welcomed. 7.6.9 Similarly, the inclusion of a Materials Management Plan and the export of incidentally extracted excess sand and gravel for reuse off site in the proposed mitigations as previously recommended is also welcomed.	Noted.	Ground Conditions
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.6.10 There is concern on the lack of clarity for decommissioning and the removal of all items associated with the PV panels such as cabling and piling spikes.	Decommissioning of the Project will be undertaken in line with the Outline Decommissioning Plan **[APP-236]**. All above ground infrastructure will be removed. All below ground infrastructure, which are not practicable to remove without major disturbances, will be cut to 1m below the surface to enable future ploughing. All piles are to be removed.	Ground Conditions

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.7.6 Parts of the proposed solar farm proposal are within the Mineral Safeguarding Areas. These are as labelled on the EN010147-000360-EN010147 APP 2.4 - Land Plans **[APP-007]**. 7.7.7 In terms of these parts of the application site, policy M8 of the Core Strategy applies. 7.7.8 The site has not been allocated in a Local Plan or Neighbourhood Plan and there is no proposal to extract the mineral prior to the development taking place.	Noted.	Ground Conditions
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.7.9 The Applicant has submitted a Mineral Resource Assessment (MRA) **[APP-195]** with the intention of showing that the need for the development outweighs the economic and sustainability considerations relating to the mineral resource. 7.7.10 In terms of determining the value of the mineral safeguarding there are two main issues: how much mineral will be sterilised and for how long will the sterilisation last.	Noted.	Ground Conditions
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Mineral Resource Affected 7.7.11 The Applicant's MRA calculates the lost mineral to be 3.58 million cubic metres which at a conversion rate of 1.5 tonnes per cubic metre would be 6.87 million tonnes. 7.7.12 The latest Local Aggregate Assessment has an Annual Provision Rate (APR) of 0.986 million tonnes. This means that the mineral lost would be equivalent to 6.97 years of supply for Oxfordshire which would be almost equivalent to a 7-year landbank requirement set out in the NPPF. 7.7.13 The amount of sand and gravel that would be prevented from being worked therefore is considered significant and would come at a time when central government are prioritising house building and growth which will need the adequate supply of sand and gravel to meet demand. 7.7.14 The MRA references policy M3 of the Oxfordshire Minerals and Waste Local Plan Part 1 – Core Strategy (Core Strategy) which sets out that, among other things, that sites allocated for sand and gravel extraction in the Oxfordshire Minerals and Waste Local Plan Part 2 – Site Allocations (Site Allocations Document) will be 25% in northern Oxfordshire and 75% in southern Oxfordshire. 7.7.15 Oxfordshire has now stopped work on the Site Allocations Document and commenced work on a new plan to incorporate both the core policies and site allocations. Nevertheless, policy M5 of the Core Strategy states that prior to the adoption of the Site Allocations Document, permission will be granted if the application is, among other things, consistent with the locational strategy in policy M3 of the Core Strategy. The Core Strategy remains the current Development Plan document and therefore policy M5 still applies. This does not mean that there is no need for mineral extraction in Northern Oxfordshire. 7.7.21 Parts of the proposal would prevent, hinder and potentially sterilise 3.58 million cubic meters of aggregate. We would therefore consider this impact on the Mineral Safeguarding Area as significant and negative, a major concern from a Mineral Planning Authority perspective. We would therefore wish to see those areas that fall within the Mineral Safeguarding Area removed from the proposal. 7.7.22 OCC wish to see those areas that fall within the Mineral Safeguarding Area removed from the proposal.	See detailed response above.	Ground Conditions
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Length of Time the Mineral Would be Affected 7.7.16 The Applicant states that the planning permission would be temporary and would be removed at the end of forty years. It would be the case that the development would be in place throughout the life of the next Minerals and Waste Local Plan, and most likely for the one following that. 7.7.17 Also, it should be noted that paragraph 168(c) of the NPPF states that when determining planning applications for end-of-life extensions to existing renewable sites, local planning authorities should give significant weight to the benefits of utilising an established site. This suggests that once the precedent of using the site for a solar farm, there would be planning policy support for continuing to do so once the temporary permission has expired. This principle could be applied to Botley Solar Farm in the future, and this would further prevent or hinder the future working of the mineral. 7.7.18 Given that the mineral being prevented or hindered from being worked and potentially sterilised if the solar farm is never removed, would be almost the equivalent of OCC's required seven year land-bank, and that the mineral would be unable to be worked a minimum of 40 years, this would be a major negative outcome from a Mineral Planning Authority perspective. 7.7.19 The Applicant has reiterated the value of the renewable energy, but they have assessed the value of the mineral as moderate to negligible and therefore have not addressed the need to overcome a major effect on the mineral resource. 7.7.20 Consequently, the case for building the part of the solar farm that would prevent, or otherwise hinder future working and possibly sterilise the mineral resource has not been justified.	The project does not permanently sterilise mineral resource and this is not considered to represent a significant effect (see detailed response above). The lifetime of the Botley West Project aligns with other similar solar farm projects of this scale and type, and which have been consented under the NSIP regime. The intention is that the development is for a time-limited period, to assist in meeting the UK's current clean renewable energy targets. Once decommissioned the land required for the Project will be returned to its original land use, and it would be possible for any mineral extraction to be sought at that time.	Ground Conditions

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Aviation: • The siting of panels on areas of land to the south of the London-Oxford Airport would be harmful to public safety by reducing the available area for safe landing in the event of Engine Failure After Take-Off (EFATO). • OHAs consider that the assessment of impacts on aviation activities including Glint and Glare, Thermal Plumes and wildlife displacement/'lake effect' is inadequate. • Remove areas of the Central Site to the south of London-Oxford Airport. • The OHAs require further assessment of wildlife displacement, 'lake effect' and bird strike and thermal plumes. • Mitigation proposals should be provided in respect of glint and glare and as identified by the additional/updated assessment of wildlife displacement, 'lake effect' and thermal plumes	The Applicant is in discussion with the airport on the matter through the SoCG. The SoCG will contain comments and further reporting to address these issues. The SoCG will contain comments and further reporting to address these issues. The "lake effect' was discussed with the Airport and was subsequently removed from the "Further Written Statement" summarized in REP1-108.	Aviation
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.16.4 London-Oxford Airport is located immediately to the east of the central site. A number of concerns have been expressed regarding the impacts of this project upon aviation activities including: • Engine Failure After Take-Off • Glint and glare: • Heat Induced Turbulence; • Increased risk of bird strike and collisions with animals caused by birds mistaking solar arrays for lakes and wildlife being displaced from areas with panels. 7.16.5 The application site for this proposal occupies statutory safeguarding zones surrounding RAF Weston on the Green, specifically the aerodrome height and birdstrike safeguarding zones and the aerodrome height safeguarding zone surrounding RAF Brize Norton. Given the significant size of the proposed solar farm, the MOD have asked to be consulted at all future stages of this scheme leading to the finalised development proposals in order to assess for any impacts to defence operations from the development.	The Applicant is in discussion with the airport on the matter through the SoCG. The SoCG will contain comments and further reporting to address these issues.	Aviation
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO 7.16.6 Whilst an assessment of Glint and Glare has been carried out there are outstanding concerns that harmful effects on aviation activities at London-Oxford Airport have not been adequately mitigated or considered. These have been detailed in the representations from Oxford Aviation Services Ltd **[PDA-002]**.	The Applicant is in discussion with the airport on the matter through the SoCG. The SoCG will contain comments and further reporting to address these issues.	Aviation
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.16.7 The airport operator has requested the removal of panels from some areas to the south of the runway in order to ensure that there is an adequate safeguarded zone, free of panels, for emergency landings in the event of engine failure after take-off (EFATO). This is a matter of public safety and, in accordance with paragraph 4.1.7 of EN-1, it would not outweigh the need for CNP development.	The Applicant is in discussion with the airport on the matter through the SoCG. The SoCG will contain comments and further reporting to address these issues.	Aviation
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.16.8 An appeal for an anaerobic digestor in Suffolk was dismissed on the grounds that it "would further erode an already constrained area for a forced/emergency landing". In coming to this decision, the Inspector noted that many of the pilots flying from Beccles Aerodrome were inexperienced and that the safeguarded zone was already constrained by an existing solar farm (see ref: APP/V3500/W/24/3354097). Due to London-Oxford Airport being a centre for pilot training, and having many single engine aircraft movements, this concern is also relevant to this development.	The Applicant is in discussion with the airport on the matter through the SoCG. The SoCG will contain comments and further reporting to address these issues.	Aviation
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.16.9 The assessment of glint and glare which includes a technical aerodrome safeguarding report **[APP-128]** is currently considered to be inadequate. The report fails to suitably address the issues of: • EFATO (the extent of safeguarded zones); • Glint and Glare (no mitigation is proposed); • Thermal plumes (which could result in turbulence and interference with aviation communication systems). 7.16.10 The report fails to provide any assessment of: • the displacement of wildlife resulting in increased chances of aircraft collisions with fauna (such as bird strike); • the 'lake effect' which could attract more waterfowl leading to increased chances of bird strike; 7.16.11 The applicants are therefore requested to provide further evidence to the ExA and Oxford Aviation Services Ltd (the airport operator) on these	The Applicant is in discussion with the airport on the matter through the SoCG. The SoCG will contain comments and further reporting to address these issues. The "lake effect' was discussed with the Airport and was subsequently removed from the "Further Written Statement" summarized in REP1-108.	Aviation

Name	Comment	Applicant's Response	Issues
	matters. Solar panels should be removed from the EFATO safeguarded zone as agreed with the airport operator. Revised mitigation proposals should be provided in respect of glint and glare and as identified by the additional/updated assessment of wildlife displacement, 'lake effect' and thermal plumes.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Hydrology & Flood Risk The applicant has not had regard to the latest Environment Agency mapping of flooding from fluvial and surface water. This may impact the sequential approach to the location of the development. • Insufficient information on surface water management during construction and • ground decompaction methods to take place following construction. • Insufficient information on the management of the ground beneath the panels during operation. • Insufficient evidence of groundwater monitoring and infiltration rate testing. • Insufficient evidence of the impact of the development of areas with established risk of flooding. Mitigation / Improvements • The applicant's approach to the Sequential Test should be revisited following review of the latest fluvial and surface water flooding maps produced by the EA. • Further information should be provided on the surface water mitigation during construction, as well as details of ground decompaction methods during the construction phase. • The Outline Operational Management Plan **[APP-234]** should be updated to include how ground conditions beneath panels will be maintained to prevent increase run off rates. • Further groundwater monitoring and infiltration testing should be carried out to inform the drainage strategy. Calculations should be provided to evidence the proposed drainage strategy. • Surface Water modelling for areas of known flood risk such as Cassington should be revisited.	We have reviewed the latest Environment Agency mapping for fluvial and surface water flooding. Based on this updated information, we have revisited the Sequential Test for site location and can confirm that the development footprint avoids areas of highest flood risk in accordance with government policy. Limited areas remain at surface water risk as before. Details of this review and the outcomes will be included in the updated 6.5 ES - Appendix 10.1 Flood Risk Assessment **[APP-166]** to be submitted at DL3. As part of DL3 the CoCP **[APP-232 and APP-233]** will be updated to include measures of managing surface water during construciton. Details of which are to be captured within the Detailed CoCP secured as part of the DCO. As part of DL3 the OOMP **[APP-234]** will be updated to include measures for maintaining ground conditions beneath the solar panels to prevent increased runoff. Infiltration testing is to be undertaken as part of detailed drainage design, captured as part of the DCO. Groundwater montoring requirements are to be added to the Outline CoCP **[APP-232 and APP-233]** as part of DL3. A separate surface water model has been prepared for Cassington to assess the baseline risk and propose potential mitigation options. This is included as 6.5 ES - Appendix 10.5 Surface Water Modelling Report [**APP-172]**.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.5.6 The applicant as part of the Environment Statement submission has produced a Flood Risk Assessment (FRA) see ES Volume 3 Appendix 10.1: Flood Risk Assessment **[APP-047]**. The project area includes extensive areas at risk of fluvial flooding primarily associated with the River Evenlode and River Thames and their tributaries and located within Flood Zone 2 and 3. 7.5.7 The OHA note the inclusion of fluvial flooding related to main river flooding and reservoir inundation impacts but defer to the Environment Agency as the statutory body in relation to these matters and the appropriate relevant representations **[RR0308]**. 7.5.8 It is also noted that Environment Agency recently released new mapping of flooding from fluvial and surface water (March 2025) and the Flood Risk Assessment **[APP047]** was completed in November 2024. This more up to date information has not been used in the assessment of the risk to these proposals. This may affect the conclusions around the sequential approach to the location of the development and elements within the development areas. 7.5.9 As the Lead Local Flood Authority, Oxfordshire County Council have a specific statutory consultee role in relation to developments that have surface water drainage. Oxfordshire County Council have prepared standards that are based on the nonstatutory technical standards produced by DEFRA. It is recognised that the applicant has sought to avoid areas at risk of fluvial flooding by restricting panel development and other elements of energy generating infrastructure to flood zone 1. The location of generating infrastructure outside of areas of fluvial flooding is to be supported and consistent with the sequential test as required by Local Development Plans. 7.5.10 The project area is situated across multiple complex catchments however and the impacts on the rivers because of changes to overland flow and surface water drainage should be considered.	The applicant acknowledges the extensive fluvial flood risk within the project area, notably associated with the River Evenlode and River Thames catchments, primarily within Flood Zones 2 and 3, as detailed in the Flood Risk Assessment (FRA) in ES Volume 3 Appendix 10.1 **[APP-047]**. The FRA was prepared in November 2024 and comprehensively addresses main river flooding and reservoir inundation impacts. Regarding the recent release (March 2025) of updated flood mapping by the Environment Agency, the applicant acknowledges that this information post-dates the FRA submission. Nonetheless, an updated FRA is being prepared, as part of a change request to ensure that solar panels are placed within Flood Zone 1 in accordance with the latest EA mapping. Finally, given the project spans multiple complex catchments, the applicant is committed to comprehensive assessment and management of surface water drainage and overland flow impacts. Detailed surface water management strategies, including sustainable drainage systems (SuDS), will be developed in collaboration with the LLFA to mitigate potential impacts on river catchments and ensure no adverse effects on downstream flood risk. This is committed to as part of the DCO.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.5.11 The Outline Code of Construction Practice **[APP-232]** at Chapter 1, paragraphs 1.10.21 to 1.10.30 includes provision for general construction practice requirements for the crossing of ordinary watercourses in relation to hydrology and flood risk. The oCoCP at paragraph 1.10.28 also acknowledges the requirement for individual more specific plans when considering consents. 7.5.12 However, the oCoCP **[APP-232]** does not include information on how surface water flows and runoff during construction will be managed or what overarching guidance is	The applicant confirms that detailed, site-specific construction surface water management plans will be developed as part of the subsequent stages of the project, in accordance with the framework set out in the Outline CoCP. These plans will be tailored to the varying conditions across the site and will incorporate best practice measures to control surface water runoff, prevent pollution, and mitigate flood risk during construction. Overarching guidance for managing surface water flows during construction will be informed by relevant legislation, industry standards, and the Lead Local Flood Authority's (Oxfordshire	Hydrology and Flood Risk

Name	Comment	Applicant's Response	Issues
	associated with these. More information on how these will be managed during the construction phase will need to be provided. Without this information it is difficult to confirm impacts on flood risk during construction. This is likely to be different depending on the specific locations on the site.	County Council) technical requirements. Measures will include the implementation of temporary drainage systems, sediment and erosion control practices, and monitoring protocols to ensure that construction activities do not adversely impact flood risk or water quality.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.5.13 The Outline Operational Management Plan **[APP-234]** includes for general provisions of attenuation. However, this document is not specific on the management of the ground to manage the runoff from the panels which is relied upon in the applicant's drainage strategy. Whilst **[APP-234]** is only an outline plan and requirement 12 of the DCO will require the submission and approval of a more detailed plan, the requirement states a paragraph (2) that the Operational Management Plan to be submitted will need to be substantially in accordance with the outline plan. As such the OHAs would like the issue of ongoing maintenance of the ground beneath the panels to be included within the Outline Operational Management Plan **[APP-234]**	We recognize the importance of ensuring effective ongoing management of surface runoff from beneath the panels to maintain drainage performance and prevent increased flood risk or surface water issues over the operational lifetime of the development. The DCO mandates the submission and approval of a detailed Operational Management Plan consistent with the outline version. The Outline Landscape and Ecology Management Plan **[APP-235]** sets out how grassland management will be managed throughout the development. A detailed Landscape and Ecology Management Plan (LEMP) will be prepared in accordance with the OLEMP and will be submitted to and approved by the relevant local planning authority or authorities prior to construction. This will include provisions in respect of on-going maintenance and management of the landscape and ecology.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.5.14 The applicant contends in the Flooding and Hydrology ES Chapter **[APP-047]** Paragraph 10.1.8 that the impact of the proposed solar farm development on flood risk is negligible with appropriate flood risk mitigation and SuDS designed within the proposal of the scheme. This needs to be considered in the context of limited evidence on: • The acceptability of the measures to control the runoff from the panels including the vegetation management, orientation of the panels and provision of filter strips, which are not specified for individual catchment areas or assessed in relation to runoff rates. • The management of the compaction and removal of vegetation during the construction stage. At present it is not explicit as to how this will be undertaken. This management during the construction phase will be key to retaining good ground condition for infiltrating flows. A Construction Environmental Management Plan (CEMP) or similar document should be produced by the applicant which details the decompaction measures to be employed post construction to ensure maximum infiltration potential is preserved. • Infiltration rate and groundwater level monitoring to establish the design parameters across the site and support the assumptions in relation to surface water runoff and features. • Post development modelling of surface water catchment to understand the impacts of panel development. The applicant relies on a literature review to explain the expected impact of the solar farm on surface water drainage as a result of the project.	Regarding the control of runoff from the panels, including vegetation management, panel orientation, and filter strips: The applicant recognizes the importance of specifying and assessing these measures on an individual catchment basis. We commit to developing more detailed, site-specific assessments and management plans to address varying catchment characteristics and runoff rates, ensuring that mitigation measures are appropriately tailored and effective. This will be incorproated as part of detailed drainage. The Detailed CoCP will detail the decompaction measures to be employed post project lifetime, during decomissionng. Concerning infiltration rate and groundwater level monitoring, the applicant acknowledges this as critical for refining design parameters and validating assumptions about surface water runoff and drainage features. Groundwater monitoring details will be provided as part of DL3 and infiltration testing will be undertaken post consent. We note the request for post development modelling of the surface water catchment. However, the detailed literature review and policy guidance on solar panel runoff is considered to provide an appropriate approach to mitigation in the context of the development. As such further catchment wide modelling is not being prepared as part of the submission.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.5.15 The LLFA's relevant representation (contained within OCC's relevant representation **[RR-0793]** indicated the proposals for surface water drainage across the site was conceptual and may be appropriate if further supporting information was provided, to include ground investigation reports, a more detailed drainage layout with identified discharge locations, updated calculations to correspond with the drainage layout, updated water quality and maintenance requirements, and further detail on how the field beneath the panels will be managed during construction, operation and reinstatement. OCC maintains its position in this regard.	At this stage the plan is conceptual and assesses the maximum design scenario. The following will be provided at the detailed drainage stage and has been committed to by the Applicant: • Ground investigation reports • Detailed drainage layout (including refined calculations) The Outline Landscape and Ecology Management Plan **[APP-235]** sets out how grassland management will be managed throughout the development. A detailed Landscape and Ecology Management Plan (LEMP) will be prepared in accordance with the OLEMP and will be submitted to and approved by the relevant local planning authority or authorities prior to construction. This will include provisions in respect of on-going maintenance and management of the landscape and ecology. Further details regarding water quality and maintenance are proposed to be added to an updated drainage strategy; 6.5 ES - Appendix 10.2 Conceptual Drainage Strategy **[APP-167]**.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The Northern Site 7.5.16 OCC as the LLFA hold records of flood incidents reported to the Council from a number of sources, some of these are not verified. We do not hold any records of flood incidents within the red line boundary for the Northern Area. Flood incidents were reported in Wootton and Woodstock which are to the west of the proposed area. 7.5.17 Modelling of the ordinary watercourses on the northern site is considered to be appropriate and that the inherent raised nature of the solar panels would ensure they would not be damaged during the residual risk occurrences.	No comment required.	Hydrology and Flood Risk

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The Central Site 7.5.18 OCC as LLFA hold records of flood incidents reported to the Council from a number of sources, some of these are not verified. We do not hold any records of flood incidents within the red line boundary for the Central Area. Flood incidents were reported in Begbrooke, Cassington and Bladon immediately outside of the boundary. 7.5.19 A moderate to negligible risk of groundwater flooding in the central area and any high groundwater levels may impact on the potential for infiltration to be as effective in this area. Furthermore, detailed testing of the groundwater level and potential for flooding is recommended to ensure equipment is located in the lowest risk from all sources.	Given that ancillary infrastructure will be above ground, and solar panels will have minimal depths into the ground, groundwater testing is not proposed., However, as part of DL3 further details on groundwater monitoring will be provided. The Applicant also acknowledges the extensive surface water flooding risk identified within the northern and central sections of the project area, consistent with local evidence and as documented in the Surface Water Modelling Report **[APP-172]**. Particular attention has been given to the village of Cassington, which has experienced recurrent surface water flooding incidents, notably at Bell Close and Elms Road.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The Central Site 7.5.20 Local evidence identifies extensive areas at risk of surface water flooding within the project area, particularly in the northern and central sections of the project. Local evidence is consistent with the information presented by the applicant in their Surface Water Modelling Report **[APP-172]**. 7.5.21 The village of Cassington which is located in the Central Section is a settlement at particular risk of impacts of surface water flooding having experienced property flooding (at Bell Close and Elms Road) on a number of occasions in recent years. 7.5.22 Detail of flood hydrology in the catchment north of Cassington are provided in Appendix A of the Hydrology Report **[APP-171]**. 7.5.23 The landowner (Blenheim Estate) recognises the risks to people and property arising from surface water flooding in proximity to the village of Cassington and has commissioned their own modelling to identify the main hydrological pathways and opportunities for Natural Flood Management (NFM) upstream of the village of Cassington. 7.5.24 It is clear that there is an existing issue of surface water drainage as is recognised by evidence prepared by the applicant, landowner and host authorities and these will require careful consideration through project design, to avoid local impacts including risks to people and property in proximity to the scheme. 7.5.25 The Cassington Stream is a particularly flashy stream which runs through the village and has a catchment of approximately 83ha to the north of the village withing the central section of the project area. 7.5.26 Local Policy (such as Cherwell Local Plan Policy ESD6, West Oxfordshire Local Plan policy EH7 and policy RNE2 of Cumnor Neighbourhood Plan) requires that all sources of flooding, (including sewer flooding and surface water flooding) will need to be addressed and measures to manage or reduce their impacts, onsite and elsewhere, incorporated into the development proposal. 7.5.27 The development proposals (Masterplan) indicate the introduction of buffer strips, bunds, ponds and ditch widening to the north of Cassington, designed and positioned to mitigate the surface water impacts of the proposal and provide betterment compared to the existing baseline position. However further work on the modelling and proposals needs to be undertaken to confirm the effectiveness of these measures to mitigate flood risk. The introduction of these measures would be consistent with Local Policy, although the management and maintenance of these measures, as well as the Cassington stream will be essential to guarantee that negative impact do not arise from the project.	The report commissioned by the landowner (Blenheim Estate) has been asssed and used as an appendix to the aforementioned modelling. This has been used to understand hydrological pathways and explore Natural Flood Management (NFM) options upstream of Cassington. The Applicant supports this collaborative approach and commits to integrating findings from these studies into the project design to avoid exacerbating existing flood risks. The Applicant recognizes the importance of addressing existing surface water drainage challenges through careful project design. Measures proposed in the Masterplan, including buffer strips, bunds, attenuation ponds, and ditch widening north of Cassington, are designed to provide betterment relative to the current baseline conditions. Further investigation is proposed post consent.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The Southern Site 7.5.28 OCC hold records of flood incidents reported to the Council from a number of sources, some of these are not verified. We do not hold any records of flood incidents within the red line boundary for the Southern Area. Incidents were reported to the north of the area in Farmoor and to the South in Cumnor.	We note that historical flooding has occurred on site and within the wider area. Commitments have been proposed to reduce flood risk and vulnerability to flooding during the construction, operation and maintenance and decommissioning periods, and are secured through requirements of the DCO **[REP1-004]**.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO 7.5.29 The proposals rely on the construction and operation management of the land to effectively drain the site for surface water flows, where this is not secured flood risk could be increased due to increased rates of runoff. The surface water drainage proposals that are included require significant information and calculations to confirm their acceptability; the Councils would require the following information: • Comparison with the new flood map for planning to show that conclusions around the sequential approach are still valid. • Inclusion in the Code of Construction Practice (CoCP) of how the ground will be managed during this period to reduce compaction of the area; this is key to the management of runoff from the site. • Inclusion in the CoCP of information on how flood risk will be managed temporarily during the construction period if there were to be an event. • How the land management during the operation will address any issues around sheeting off the solar panels to reduce bare ground, channelling of	A change request is proposed to ensure that the latest Flood Map for Planning has been used to cite the location of solar panels at the site. A separate technical note will be prepared and submitted at DL 3 comparing the latest surface water maps with the previous surface water maps. The CoCP will be secured as a requirement of the DCO.	Hydrology and Flood Risk

Name	Comment	Applicant's Response	Issues
	water in any specific way. The inspection and maintenance are key to mitigating any potential effects and should be included in any operational plans. • Information on the ground conditions such as infiltration testing is required to understand the infiltration potential. Groundwater levels should be included in any assessment of runoff rate, drainage design and any surface water modelling or drainage strategy. • Surface water measures for the solar arrays do not include any 'calculations' to show that they will be appropriate. These calculations need to be informed by the ground conditions to show how any runoff can be accommodated within the ground, filter strips and other measures. • Surface water modelling to be undertaken to catchment areas where required to understand runoff regime and measures that will be required to manage surface water flooding. • The surface water modelling undertaken for Cassington has a number of areas of concern on the modelling approach and the proposals for mitigation in this area.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.5.30 In relation to Schedule 15: protective provision Part 3 we do not understand the purpose of this part other than to try and amend the existing timeframes for determination of a consent under the Land Drainage Act 1991 ("LDA 1991") Section 23. 7.5.32 This is a reasonable amount of time to determine a consent and does not require a reduction as suggested by the 28 days indicated in the Draft Protective provisions	The Applicant is confident that Protective Provisions can be agreed before the end of Examination and negotiations are ongoing.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.5.34 OCC have an Agency Agreement with each District Authority in relation to them determining consents under the requirements of the LDA1991. This agreement provides for these consenting activities to be undertaken as per the process and requirements of the LDA 1991 including those timescales detailed within that Act. OCC are not able to agree the protective provisions as identified in the section without renegotiation of those agreements to provide for an amendment to any process or time frame. And OCC are not in a position to agree those where the resource is provided by the district in accordance with that agreement or require a significant change to the existing process for managing works on ordinary watercourses. 7.5.35 OCC therefore see no reason to have specific provisions that alter the requirements of the LDA 1991 in relation to issuing a consent to undertake works of this nature.	The Applicant is confident that Protective Provisions can be agreed before the end of Examination and negotiations are ongoing.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.6.7 To address impacts on ground conditions the DCO requires details of surface water drainage works and (if any) foul water drainage system including means of pollution control to be submitted to and approved by the relevant planning authority (Sch2 Req9) along with soil management plans and site resources and waste management plans (Sch2 Req11).	At this stage 6.5 ES - Appendix 10.2 Conceptual Drainage Strategy **[APP-167]** has been prepared which details the plans for surface water drainage at the site. No connection to foul water is proposed. A detailed drainage strategy will be prepared and agreed with the Lead Local Flood Authority, captured as part of the DCO.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Impacts of the Scheme on Climate Resilience 7.10.30 The impact of the proposed development on (non-greenhouse gas) climate impacts in the local area are likely to be small, however without a proper assessment of climaterelated hazards (as per the issues scoped out of assessment **[APP-051]**) they cannot be fully realised. 7.10.31 It was noted in OCC's Relevant Representation **[RR-0793]** that runoff rates from the site must be controlled with adequate mitigations such as vegetation cover beneath the panels and ensuring the ground is not compacted during construction and maintenance (paragraph 6.2). Increased risk of extreme weather from climate change, including higher levels of rainfall, storms and flash flooding, will exacerbate these impacts and could cause other issues such as localised soil erosion where rainwater running off the panels could result in channels in the ground beneath. 7.10.32 This demonstrates the importance of understanding the likely impacts of a changing climate on the site, in order to inform mitigations against unintended impacts of the site on the land and the surrounding communities.	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 Proposed Developments renewable energy provides a positive and significant beneficial contribution to reducing the health effects associated with climate change, locally, nationally and internationally. The design of the Proposed Development, including its location and design of components, has adequately considered climate risks such as extreme weather events. Due to climate change, increased frequency and intensity of extreme weather events such as storms with high winds are also possible in the existing and future baseline conditions. Manufacturing standards for PV modules (listed above) require consideration for extensive weathering (such as from hailstorms) and extreme thermal fluctuations. As such, extreme weather events are not considered to cause significant environmental effects to the Project. At Deadline 1 the Applicant prepared a document which details the methodology and approach undertaken at the scoping stage concerning potential climate change effects on the Project which were scoped out of the climate change chapter **[APP-051]**. The document refers to design considerations and standards which design out significant risks due to climatic variations. This is included at Appendix 2 of REP1-019. As part of the Flood Risk Assessment climate change allowances are considered for peak river flow allowances, and peak rainfall allowances. Climate change in the context of rainfall runoff is included within 6.5 ES - Appendix 10.2 Conceptual Drainage Strategy **[APP-167]**.	Hydrology and Flood Risk
Joint Local Impact Report of CDC, VWHD, WODC and OCC	• Peridswell Farm and Shipton-on-Cherwell village wards should be included in the Wards assessed by the ES chapter **[APP-053]**.	See Applicant's Response to ExA Q1.13.1 **[EN010147/APP/12.2]**. Peridswell Farm and Shipton-on-Cherwell village are within the parish of Shipton-on-Cherwell and Thrupp, which is within Launton and Otmoor ward.	Human_Health

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	• Glint and glare and noise impacts on schools within 1km of the site have not been assessed. Yarnton Pre-School and William Fletcher Primary School in Yarnton and Cumnor C of E Primary School have been omitted from the list of sensitive receptors.	See Applicant's Response to ExA Q1.13.2 **[EN010147/APP/12.2]**.	Human_Health
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Mitigation / Improvements • Glint and glare and noise impacts should be assessed for all schools within 1km of the proposed development site.	See Applicant's Response to ExA Q1.13.2 below: 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 **[REP-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 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 facilites 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 **[REP-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 **[REP-020]** response to RR-0793-066 (pdf page 129-130 pf 545). This confirms that relevant educational establishments have been considered. 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 **[REP-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.	Human_Health
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Mitigation / Improvements • Yarnton Pre-School and William Fletcher Primary School in Yarnton and Cumnor C of E Primary School should be considered sensitive receptors for the purposes of the ES assessment.	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	Human_Health

Name	Comment	Applicant's Response	Issues
		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. Additional detail is set out in Applicant's Response to ExA Q1.13.2 **[EN010147/APP/12.2].**	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.8 The Human Health Study Area map **[APP-106]** together with the ward description at paragraph 16.4.10 of the ES Chapter 16 **[APP-053]** indicate that Launton and Otmoor ward is excluded from the assessment. This ward includes Peridswell Farm as well as residences in Shipton-on-Cherwell village, both within 1km of the proposed works which should be included as part of the assessment.	See Applicant's Response to ExA Q1.13.1 **[EN010147/APP/12.2]**. Peridswell Farm and Shipton-on-Cherwell village are within the parish of Shipton-on-Cherwell and Thrupp, which is within Launton and Otmoor ward.	Human_Health
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.9 The method of determining the vulnerability of sensitive receptors is acknowledged, and the schools, care homes and other healthcare facilities identified as facilities associated with vulnerable groups are crucial for the assessment. Yarnton Pre-School and William Fletcher Primary School in Yarnton have been omitted from the list, as has Cumnor C of E Primary School; these receptors are within 1km of proposed panels and should be included in the assessment. As set out in OCC's RR **[RR-0793]**, OCC have concerns that glint and glare and noise impacts on schools within 1km of the sitehave not been assessed.	See Applicant's Response to ExA Q1.13.2 **[EN010147/APP/12.2]**.	Human_Health
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.10 The assessment **[APP-053]** identifies that rates of adult obesity and physical inactivity in children are higher than the England average in at least one of the impacted District areas, and rates of adults walking for travel are low too. This reinforces the importance that the proposed development should not only protect greenspaces, rights of way and areas of recreation, but also actively promote their use and ensure that any impacts arising from the development are adequately mitigated.	We note the point with regards to local obesity rates and the importance of protecting and promoting opportunities to be physically active. The OCC query on this matter (RR-0793-055) has been responded to in the Botley West Solar Farm Applicant Responses to Relevant Representations **[REP-020]** response to RR-0793-055 (8.6) (pdf page 93 of 545). Protecting and promoting opportunities to be physically active has been a strong theme of the health assessment and the development of mitigation.	Human_Health
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.17 The Human Health study area should be expanded as set out above and schools within 1km of the proposed development should be included in the assessment.	See response above in relation to schools. Applicant's Response to ExA Q1.13.2. 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. Children and young people are considered sensitive receptors in the Human Health assessment **[APP-053]**, including but not limited to their time at school. All school locations have been considered as sensitive receptors due to the presence of children.	Human_Health
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Air Quality • Air quality will be impacted during construction and decommissioning. • Dust emissions can be controlled via Dust Management Plans implemented through Requirement 11 in the DCO. Mitigation / Improvements • None.	No Response Required	Air_Quality
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.15.3 Air quality will be impacted during construction and decommissioning owing to the generation of dust from disturbing soil. This is relevant for both the construction of the solar farm (where dust may travel on the wind towards dwellings and other premises within the vicinity of the site) and for the cable route with the same consequences. Impact from decommissioning is likely to be from the removal of the solar farm as the connecting cable once disconnected is likely to be left in situ. Another impact is from emissions from vehicles working on the site or using highways. These could have a potentially negative or potentially neutral impact, depending on the success of the mitigation measures employed in the various management plans. The impact of vehicles during decommissioning may be very different depending on how much diesel and petrol use declines over the next 40 years.	The Applicant undertook both a Construction Dust Risk Assessment (DRA) and detailed modelling assessment of construction traffic. The DRA detailed the potential risk of the site and the level of mitigation required to reduce the impacts to a level that is not significant. These measures have been secured in a Dust Management Plan. The detailed modelling assessment concluded that there would be a negligible impact from the vehicle construction traffic. During the decommissioning phase, the impacts would be no worse than during the construction phase.	Air_Quality
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO 7.15.4 Chapter 19 of the ES discusses Air Quality **[APP-056]**. It considers particulates from construction traffic and advises that dust emissions will be controlled via Dust Management Plans developed in accordance with the Outline Dust Management Plan **[APP-233]** contained within the Outline Code of Construction Practice submitted with the application **[APP-232]**.	No Response Required	Air_Quality

Name	Comment	Applicant's Response	Issues
	7.15.5 It is considered the ES contains adequate information for the Examining Authority to assess the impact of the proposal on air quality. 7.15.6 Dust Management Plans are implemented through Requirements 11 in the DCO.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Cumulative Effects and Inter-relationships • The applicant has identified most cumulative effects under Tiers 1 and 2. • Cumulative effects with allocations in WODC and CDC emerging Local Plans have not been referred to in the ES under Tier 3. • The proposed development will result in negative local impacts on landscape and heritage cumulatively with other developments. Mitigation / Improvement • Assessment methodology is revisited to ensure cumulative effects considers the full scenario whereby multiple projects may exist in the landscape. • It is further requested that a mapped figure illustrating the locations of the schemes considered in the cumulative assessment is provided.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships **[APP-057]**. This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. The Applicant deems the approach taken to the cumulative assessment that has been carried out as being suitable and appropriate at the time. The allocations in WODC and CDC emerging Local Plans can be considered along with other allocations that come forward and will be referred to in an updated assessment. The figures in the DCO are currently shown at **[APP-116, APP-117 and APP-118]**, these can also be updated accordingly to show these additional schemes and allocations where appropriate.	Cumulative Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.17.1 The applicant's environmental statement illustrates how the proposed development relates to other planned and permitted development in the area. 7.17.2 Significantly, in the case of West Oxfordshire, there are 3 non-strategic allocations for residential development at Woodstock (Northern Area) and a new garden village proposed in the Central Area for 2,200 dwellings. 7.17.3 WODC are in the process of preparing an updated Local Plan for the district and are currently considering options for further residential development in proximity to the proposed solar farm.	The assessment of cumulative effects is contained in ES Volume 1, Chapter 20: Cumulative Effects and Inter-relationships **[APP-057]**. This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. As stated in the Chapter, the assessment of cumulative effects is based on the short listed developments and publicly available information. The short list of developments has been regularly updated. However, an appropriate cut off at September 2024 had been applied prior to publication of the ES to allow the assessment to be finalised. Any new applications that have come forward after the cut -off have not been included in the ES. However, it is noted in the chapter that new developments coming forward after the cut-off date for the ES can be considered during the examination period if required by the Examining Authority. This also includes where Local Plans have been updated as well and allocations to developments.	Cumulative Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.17.9 The OHA consider that the proposed development will result in negative local impacts on landscape and heritage cumulatively with other developments. ICOMOS undertook a technical review of the cumulative impact of residential development within the setting of Blenheim Palace WHS in February 2024 (appended to WODC Relevant Representation **[RR-1102]**) concluding that development at Woodstock had cumulatively negatively impacted the outstanding universal value of the property through an erosion of its setting.	The ICOMOS review concerns development around Woodstock over the past decade and how this has eroded the setting of the WHS. The methodology for the CEA undertaken in the ES is based on advice from IEMA and adheres to PINS own guidance. The CEA therefore considers only other developments potentially coming forwards in the near future, whereas the comment refers to a need to evaluate development that has already been built out (mostly residential) - which has been done albeit consider as part of the established baseline. Further evaluation on ICOMOS comments will be made in the next revision of the Heritage Impact Assessment that respond and update to comments from Historic England and other stakeholder.	Cumulative Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.17.10 The LUC review in Appendix 1 includes a section on cumulative effects (paras 2.59 – 2.61). It highlights that the cumulative assessment only seems to consider cumulative interactions between the Proposed Development and each cumulative project on its own, rather than all the cumulative projects at the same time. This approach potentially downplays the extent of cumulative effects, as it does not consider the full scenario, whereby multiple projects may co-exist. 7.17.11 The OHA therefore request that the assessment methodology is revisited to ensure that "the assessment of cumulative effects considers the full scenario, whereby multiple projects may exist in the landscape." It is further requested in the same paragraph "that a mapped figure illustrating the locations of the schemes considered in the cumulative assessment is provided." (para 2.72, Appendix 1). 7.17.12 The OHA consider it important that all impacts related to the development are considered cumulatively and comprehensively. This also applies to the development itself, which effectively comprises four developments (the northern, central, southern site, and the substation). The need for a comprehensive assessment of all related structures also remains important, even if the NGET substation was to be moved outside the site boundary.	All considered Tier 1 cumulative developments are residential developments. Planning considerations for housing development and solar development differ. Additionally, the nature of the development differs. In essence, residential housing developments are long-term and permanent. In visual terms, when considering the addition of the Project to the Tier 1 scenario, residential areas themselves can be considered as visual receptors, receiving potential effects attributable to solar farm development. With regard to the landscape effects, the proposed developments would extend the developed nature of the existing agricultural land. However, this clustering approach is preferable to a random scattering of individual developments, which would have a higher cumulative impact on the overall landscape fabric/ character. It should be noted that, due to the neighbouring proposed residential housing developments, which are expected to transform the rural landscape into a semi-urban one, the susceptibility of the proposed development site would decrease. Alongside this, people's expectations will change. As part of any planning permission residential developments need to submit a comprehensive Landscape Strategy which compensates for the loss of landscape features and creates a high-quality living environment, as well as habitat enhancement. Section 8.11, within the Landscape and Visual Impact Assessment **[APP-045]**, describes the relationship between these residential developments and the Project. In landscape terms, as noted above, these developments would collectively impact the agricultural landscape and shape its transformation towards semi-urban character. Within this	Cumulative Impacts

Name	Comment	Applicant's Response	Issues
		future baseline context, the Project, along with the proposed mitigation, would be an appropriate fit within the developed context. The addition of the Project to the Tier 2 Red House Solar Farm development would expand the area of agricultural land under solar panels, as described in paragraphs 8.11.74-79. As the planning application for this development has not yet been submitted, the final layout of the development, alongside its Landscape Strategy, is not yet available; therefore, the assessment is speculative in nature. Mapping showing the location of cumulative schemes considered by the ES has been provided as: • Figure 20.1 - West Oxfordshire - **[APP-116]** • Figure 20.2 - Cherwell - **[APP-117]** • Figure 20.3 - Vale of White Horse - **[APP-117]** A figure showing this has been appended to the bottom of this document as 12.3.4. 7.17.12 The LVIA has assessed the Project as a whole rather than individual elements. The ZTV illustrate all built elements, including the substation(s) etc. and these elements are captured within the visualisation from a number of Representative Viewpoints, including an indicative outline of the NGET substation. Visual effects related to substations have been described for all representative viewpoints (for example, VP13, 46, 50, 51), where these elements of the Project become visible, they are also shown on visualisations.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Human Health • The OHA believe that the design of the proposed development could be improved to ensure the efficient response of fire and rescue crews in the event of an emergency. • There is currently limited information in relation to fire and rescue vehicle access routes. Consideration should be in place for ensuring suitable fire service access and egress routes are provided, along with suitable hardstanding. Mitigation / Improvement • The application should include sufficient access and egress for fire and sufficient hardstanding for fire and rescue crews and equipment to access all elements of the application site. The applicant should liaise with the Oxfordshire Fire and Rescue Service to ensure the operational layout of the scheme will not hinder the efforts of the fire and rescue services in the event of an emergency.	Safe and reliable access for emergency services during the operational life of the Botley West Solar Farm is addressed in the Outline Code of Construction Practice **[APP 232]** Section (1.8.21-1.8.22). The internal access network has been designed to accommodate emergency vehicles, including fire engines and ambulances, with durable, all-weather tracks maintained across the site. Strategic emergency access points will remain unobstructed throughout the operational phase. In addition, the Applicant intention is to engage with the Oxfordshire Fire and Rescue Service, ensuring that adequate emergency accesses are maintained throughout the operational life of the project. This will ensure that any specific requirements for fire service are considered.	Fire Safety
Joint Local Impact Report of CDC, VWHD, WODC and OCC	• The outline operational management plan **[APP-234]** needs to be updated to ensure that vegetation around areas that generate heat is sufficiently maintained to prevent wildfires.	Fire safety risks, including those from dry vegetation, are mitigated through setbacks from homes, clearance buffers from vegetation, and use of industry-standard infrastructure meeting all safety regulations. During operation, regular maintenance will control vegetation and ensure safe site conditions. Vegetation control is integral to fire prevention and will be addressed through regular maintenance practices, including mechanical cutting and conservation grazing, to reduce the potential for ignition beneath the panels.	Fire Safety
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.11 There is currently limited information in relation to fire and rescue vehicle access routes. Consideration should be in place for ensuring suitable fire service access and egress routes are provided, along with suitable hardstanding. 7.12.12 Site information should be stored and available for fire crews on arrival to understand any emergency response plan in place and the response time for onsite technical assistance. 7.12.13 This site currently does not show any buildings that the fire safety order would apply too. Should this change, it is taken that any buildings or structures will be subject to a Building Regulations application and subsequent statutory consultation with the fire service, to ensure compliance with all the functional requirements of The Building Regulations from B1 to B5.	7.12.11: Safe and reliable access for emergency services during the operational life of the Botley West Solar Farm is addressed in the Outline Code of Construction Practice **[APP-232]** Section (1.8.21-1.8.22). The internal access network has been designed to accommodate emergency vehicles, including fire engines and ambulances, with durable, all-weather tracks maintained across the site. Strategic emergency access points will remain unobstructed throughout the operational phase. 7.12.12: Emergency response and fire safety procedures for Botley West Solar Farm are outlined in Section 1.8.21 of the Outline Code of Construction Practice (CoCP). The Applicant confirms that a comprehensive Emergency Plan will be prepared by the Principal Contractor prior to the commencement of construction. This plan will include specific provisions for fire risk management, as well as site-specific arrangements for coordinating with emergency services, including the fire service, in the event of an incident.	Fire Safety

Name	Comment	Applicant's Response	Issues
		As stated in Section 1.8.22, the emergency response plan will be kept on site and readily accessible, and will include contact information for emergency responders, evacuation procedures, and fire control strategies. This ensures that on arrival, fire crews will have immediate access to the necessary documentation and spatial information to respond effectively to any incident. A yearly workshop with the fire department will also be proposed. 7.12.13: The Applicant confirms that any buildings or structures falling within the scope of the Regulatory Reform (Fire Safety) Order 2005 will be subject to the relevant Building Regulations approval process. This will include statutory consultation with the Fire and Rescue Authority, ensuring compliance with the functional requirements of the Building Regulations, including B1 to B5 (covering means of escape, internal and external fire spread, access for firefighting, and detection systems).	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.14 Wildfire risk is increasing across Oxfordshire but particularly around the Blenheim area where there have been red alerts. Grass and vegetation need to be adequately managed around areas of the proposed development that might generate or reflect heat.	Fire safety risks, including those from dry vegetation, are mitigated through setbacks from homes, clearance buffers from vegetation, and use of industry-standard infrastructure meeting all safety regulations. During operation, regular maintenance will control vegetation and ensure safe site conditions. Vegetation control is integral to fire prevention and will be addressed through regular maintenance practices, including mechanical cutting and conservation grazing, to reduce the potential for ignition beneath the panels.	Fire Safety
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.18 The fire and safety points raised must be covered by the application or DCO requirements. This could be achieved by revising the Outline Operational Management Plan **[APP-234]** to include the ongoing maintenance of vegetation surrounding equipment which may generate heat or reflect light as well as liaising with the Oxfordshire Fire and Rescue Service to review the Operational Development Areas Plan **[APP-227]** to ensure adequate access and egress is available to the fire services in the event of an emergency.	Fire safety risks, including those from dry vegetation, are mitigated through setbacks from homes, clearance buffers from vegetation, and use of industry-standard infrastructure meeting all safety regulations. During operation, regular maintenance will control vegetation and ensure safe site conditions. Vegetation control is integral to fire prevention and will be addressed through regular maintenance practices, including mechanical cutting and conservation grazing, to reduce the potential for ignition beneath the panels In addition, the Applicant intention is to engage with the Oxfordshire Fire and Rescue Service, ensuring that adequate emergency accesses are maintained throughout the operational life of the project. This will ensure that any specific requirements for fire service are considered.	Fire Safety
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.15 Ground works must also account for sensitive national hazard pipelines, fuel pipelines and cabling running across this site area	As part of the Environmental Impact Assessment (EIA) and the Desk Study and Preliminary Risk Assessment (PRA) work outlined in Chapter 11 of the Environmental Statement (Ground Conditions), the project has adopted a precautionary and robust approach to the identification, assessment, and protection of such buried assets throughout all phases of the project lifecycle. The relevant Statutory Authorities, with assets within the proximity of the scheme, have been mapped and taken into account with the design of the Solar Farm. The Statutory Authorities have been engaged with, to determine exclusions zones, and safe working distances. Protective Provisions are being negotiated with the relevant Statutory Authorities, to have a legal framework to manage any interaction with the Statutory Authorities assets should they occur.	Project Description and design parameters
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.12.16 During construction, traffic routes to events at Blenheim Palace and emergency routes for Blenheim / Oxford Airport / Farmoor reservoir, and evacuation routes for communities would need to be maintained.	As detailed in the outline CoCP **[APP-233]** Annex A Outline Construction Traffic Management Plan, paragraph 1.1.7 states: "*The purpose of the OCTMP is to set out how the numbers and routeing of Heavy Goods Vehicles (HGVs) will be managed during the construction phase, how the movement of construction worker traffic will be managed during the construction phase, details of measures to manage the safe passage of HGV traffic via the local highway network and details of localised road improvements if and where these may be necessary to facilitate safe use of the existing local highway network*". Paragraph 1.1.8 states: "*A detailed Construction Traffic Management Plan(s) (CTMP)(s) will be prepared strictly in accordance with this OCTMP and in consultation with Oxfordshire County Council (OCC) as the Local Highway Authority and National Highways as the highway authority for the strategic road network. Although one detailed CTMP is envisaged, should NGET wish to adopt their own separate detailed CTMP specific to the construction of their substation that forms part of the Project (as set out in Volume 1, Chapter 6: Project Description of the ES), it would be prepared separately but remain strictly in accordance with this OCTMP*". This is secured through Requirement 11 of Schedule 2 of the draft DCO.	Project Description and design parameters
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Ecology, Nature Conservation & Trees • It is not clear how ecological surveys have informed the design of the scheme including layout and mitigation. • The OHA believe that the surveys and assessment submitted to date with regards to bats, otters and water vole, great crested newts, 'the lake effect', nature recovery, woodlands and BNG are not sufficient to consider the full	The issues set out are addressed individually below. • Individual tree surveys and protection regimes will be developed at detailed design stage, as at this stage actual conflicts with trees will be know,	Local Ecology and Nature

Name	Comment	Applicant's Response	Issues
	impacts related to each of these receptors/issues. There is also a need to improve the enhancement methods proposed within the submitted documentation. • There has been insufficient avoidance, mitigation and compensation methods for farmland birds. • The proposed cabling routes appear to significantly impact the Root Protection Areas of multiple trees • The applicant has not justified why such wide-ranging powers to remove trees and hedges within the scheme as described in article 38 and 39 of the DCO are justified. Mitigation / Improvements • The OHA require further survey work to be carried out in relation to bats, otters and water voles. • A detailed arboricultural survey needs to be carried out for the whole site. This survey needs to feed into the Arboricultural Impact Assessment. There should be a minimum buffer around ancient and veteran woodland, and this should be in line with Natural England and Forestry Commission Guidance. • The proposed development needs to deliver BNG for watercourses as well as woodland connectivity and expansion. • The OHAs require additional enhancement/mitigation measures to be provided in relation to bats, otters and water voles, great crested newts, farmland birds, nature recovery and ancient woodlands. • A legal agreement needs to be put in place to provide for offsite mitigation as well as the ongoing monitoring and management of all proposed enhancement and mitigation measures. The applicant needs to indicate which method of Great Crested Newt licensing they will be pursuing. • Cable routing should avoid the Root Protection Areas of all trees within and adjacent to the site boundary. • Individual tree protection plans must be provided for all the sites. • Article 38 and 39 of the DCO should include the need for prior approval of the host authorities for all tree and hedge removal within the site.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.9 Given the very large area of the proposed development, it constitutes a landscape scale change which cannot fail to have an impact on ecology and biodiversity. There is little research on the impact of solar farms of this scale on species in the UK and therefore a precautionary approach should be applied when considering how best to avoid or mitigate negative effects.	The landscape scale of the Project was recognised by the Applicant at an early stage of the development design. As set out in section 7 of the oLEMP, the ecology strategy for the Project has been developed with the aim of ensuring that appropriate landscape-scale ecological benefits were realised. The main component of this is the Evenlode Corridor but linkages across the Project site will also be created to enhance connectivity between the blocks of ancient woodland. At the time the Project was being designed, the Oxfordshire Local Nature Recovery Strategy (LNRS) was not available, but the Oxfordshire Nature Recovery Network (ONRN) was used to ensure alignment between the Project and the county-level strategic ecology goals. The resulting alignment of the Project with the emerging LNRS has been acknowledged by the Host Authorities (section 7.4.69 of the LIR **[REP1-072]**). The Applicant looks forward to working with the Host Authorities in developing the Project further, ensuring alignment with the goals of the emerging LNRS, during detailed design, should Development Consent be granted.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.11 Ecological survey over this significant area of Oxfordshire has highlighted the presence of some important species for the County, most notably the presence of maternity roosts for Bechstein's bats (a rare species listed under Annexe II of the Conservation of Habitats and Species Regulation 2017, which has not previously recorded breeding in Oxfordshire) and barbastelles (also an Annexe II species), as well as the presence of dormice and nightingale which are very rarely reported in Oxfordshire. These are exciting records for the County, and whilst it is likely that many of the important species found can be accommodated alongside the scheme (with the exception of farmland birds, especially skylarks), for many of the species found, it is not apparent how the ecological surveys have informed design of the scheme to avoid, mitigate or compensate for impacts and provide species-relevant enhancements. We also have concerns that the aquatic environment, both in terms of habitat and species it supports, has been somewhat overlooked in the assessment and project design. 7.4.12 Regard should be had to the Relevant Representation of the Environment Agency **[RR0308]** and Natural England **[RR-0761]**, and Natural England's Procedural Deadline A Submission in relation to outstanding bat survey information and mitigation measures **[PDA-009]**.	The Project site has been subject to considerable survey effort with respect to ecology over four years (2022 until 2025). The receptors that required consideration within the Project design are therefore well known and have been designed to ensure that all ecology receptors can be accounted for, wherever possible. For example, the Project will deliver over 26km of new species-rich hedgerow which will provide extensive new habitat for dormice, invertebrates, bats and many farmland birds that rely on them (such as yellowhammer). Impacts to other taxa have been mitigated as far as is practicable with the only residual significant effect being to wintering birds during construction. The removal of panels from the Project around Bladon as part of Change Request 2 will help reduce that impact further from that assessed in the ES. The Project has been specifically designed to enhance the Evenlode Corridor and all other water courses will be protected with larger buffers compared to the intensive arable baseline. In addition, water quality across the area will improve as a result of the removal of agricultural inputs. As such, the Applicant has considered the aquatic environment in both assessment and design. Natural England **[RR-0761]** and Environmental Agency **[RR-0308]** Relevant Representations are set out and responded to in the Statement of Common Grounds **[REP1-025-REP1-028]** including any ongoing matters. The requested bat survey information **[PDA-009]** will be presented with the Bat Technical Note as soon as analysis is complete.	Local Ecology and Nature

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Bats 7.4.13 The Bat Survey Report **[APP-153]** concluded that the assemblage of bats present is of at least national importance, that two Annex II bat species (barbastelle and Bechstein's) use woodlands adjacent to the site for roosting and that the mosaic of habitats within the Zone of Influence is of at least national importance. The assemblage of bat species uses the woodlands and intervening habitats adjacent to, within and across the site for roosting (including maternity), foraging and commuting, including the River Evenlode as a water source. 7.4.14 There is currently only brief information on how these bats could be impacted. There is no assessment of whether the scale of the proposals, with large areas of solar arrays between woodlands, could have a discouraging impact on the movement and foraging of these bat species, and important bat flight lines have not been identified. More information on this aspect is required to provide certainty that these species would not be negatively affected. In particular, buffer widths alongside important flight lines (foraging/commuting routes) such as hedgerows and the treatment of these in terms of habitat creation/management have not been specified. It is also necessary to consider the impact of vibration, noise and lighting during the construction and operation phases. 7.4.15 It is noted that OHA concerns regarding identification of key areas for bats and measures to avoid or mitigate impacts are shared by Natural England, who have set out, in detail, concerns around survey approach and baseline data and how this has informed project design, including details of mitigation and enhancement (see pages 4-11 **[RR-0761]** and **[PDA009]**).	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note 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 inform refinement 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), based on survey data available at the time and conservative, reasonable worst case scenario assumptions. Data will also be used to address Natural England's other concerns with respect the bat survey data and impacts to bats,. Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Otter and water vole 7.4.16 In earlier stages of consultation, the OHAs expressed concern about the lack of survey for otter and water vole; the Environmental Statement sets out the approach taken, indicating that there is no need to survey for water vole, as they are considered as a receptor by virtue of assessment of the effects on watercourses (see paragraph 9.6.77**[APP-046]**). Otters are considered as a receptor within the Environmental Statement (see paragraph 9.6.78 of Chapter 9 **[APP-046]**), but no survey has been undertaken to determine their presence or use of the watercourses. 7.4.17 The Environmental Statement indicates that it is assumed that otter forage and commute within the project site, and that there may be holts along the river, but there has been no survey to confirm this (paragraph 9.9.195 of **[APP-046]**). It is recognised that short term disturbance to otter could occur due to noise and vibration during construction (paragraph 9.12.180 of **[APP-046]**); the assessment of the impact of such disturbance would be better informed if it were understood whether there were otter holts along the river as it passes through the project area. 7.4.18 This needs to be considered in relation the protection otters receive under the Conservation of Habitats and Species Regulations 2017. Equally, noise and vibration during construction could disturb water vole, again this needs to be considered in relation to the protection water vole receive under the Wildlife and Countryside Act 1981. This is particularly relevant in terms of HDD crossings of watercourses but could also apply to the installation of solar panels in proximity to watercourses. 7.4.19 The lack of otter and water vole surveys has also been raised by the Environment Agency in its Relevant Representation (see page 55 **[RR-0308]**)	Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity **[APP-046],** otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact. This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean *et al* 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run-off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Great Crested Newts (GCN) 7.4.20 It is noted that only a low population of GCN was recorded in 2 ponds outside the project boundary. Given the presence of low populations nearby (including previous records at City Farm within the Salt Cross Garden Village site), it would be beneficial to improve the habitat for GCN in the scheme area through biodiversity enhancements including the creation of more ponds and connected terrestrial habitats such as woodland, scrub, ditches, hedgerows and tussocky grassland. 7.4.21 Great crested newts exist in metapopulations and move around between ponds during an individual season (in 1 year) and also between years. Newts could be found breeding in a pond one year, but not in the next. This is why Natural England usually require at least four years' worth of absence data for a pond to be considered not to be used by the species (for licensing purposes). A single eDNA survey is therefore not sufficient to confirm absence from a pond. Previous records of presence should be taken into account and a "worst case scenario" approach taken with regard to this species and its potential to move across the site	GCN populations will benefit from habitat creation and enhancement proposed for the site in the oLEMP **[APP-235]**. This will include circa. 100 ha of new floodplain mosaic habitats along the River Evenlode corridor, 26.5 km of new species rich hedgerow, 22 km of enhanced hedgerow, 15 ha of woodland and expanses of wildflower grasslands and scrub habitats. The survey methodology for GCN has been agreed with Natural England, presented within Table 4.1 of the Statement of Common Ground – Natural England **[REP1-028]** and licensing discussions with Natural England are ongoing. Furthermore, GCN eDNA and population surveys to inform license applications and for pre-commencement are being undertaken in 2025. At this stage, it is anticipated that the Project will use a Natural England mitigation licence for GCN and discussions with NE in respect of this are on-going. However, the Project may make use of the DLL, if that is more appropriate, as per commitment 9.13.	Local Ecology and Nature

Name	Comment	Applicant's Response	Issues
	using suitable habitats. Before the DCO is made, thorough consideration must be given to the licensing approach for this development due to its size and potentially significant impact. The Environmental Statement refers to both the potential use of the district licensing scheme and the standard Natural England licence. However, this would need to be confirmed before the DCO can be completed, as the district licensing scheme would require certain conditions to be written into it. Consultation with the NatureSpace Partnership who run the scheme on behalf of the local planning authorities in Oxfordshire should therefore be carried out to explore the use of Oxfordshire County Council's licence (as they cover the whole region). 7.4.22 The district licensing scheme's approach incorporates onsite mitigation where required and also incorporates a proportionate requirement for off-site compensation for delivery by the Newt Conservation Partnership. This is based on a landscape-scale conservation strategy for great crested newts whereby ponds and terrestrial habitats are created in strategic locations to bolster and re-connect existing populations. Even if the district licensing scheme is not used, the proposed solar farm must incorporate the creation of suitable aquatic and terrestrial habitats for great crested newts, which would also provide significant benefits for other species, such as Common toad, Grass snake and Otter, and wider environmental benefits.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Farmland Birds 7.4.23 The bird surveys **[APP-158]** and **[APP-159]** have identified significant numbers of breeding and wintering farmland birds many of which are red list, or priority or protected species. The breeding bird survey report indicates the breeding bird assemblage to be of County importance, although this is not correctly reflected in the Environmental Statement which assesses the assemblage as being of local importance only.	The breeding bird assemblage assessed in the Chapter 9 of the ES **[PDB-008]** was considered to be of County significance as displayed in Table 9.6.4. This translates to a Medium sensitivity/ value in the assessment.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Farmland Birds 7.4.24 Whilst areas of archaeological importance would be managed as grassland to benefit species associated with farmland, it does not seem likely that the extent of this area will offer sufficient opportunity to offset the loss of farmland habitat to these birds and other farmland species, in particular for skylarks. These grasslands add up to approximately 36 hectares of suitable habitat (if managed appropriately), but they comprise lots of smaller discrete parcels that would be unsuitable for breeding skylarks. 7.4.25 Skylark plots are scattered through the panel areas. The purpose of these seems unclear (11.6 of oLEMP **[APP-235]**). They do not fit with the description and management for AB4 of the Countryside stewardship and management as stated. It is unlikely that skylark plots will be successful in maintaining the breeding population within a solar farm. Skylark plots are not designed to provide nesting sites, but to open up the sward in agricultural settings to increase accessibility to invertebrate prey.Leaving areas unsown within the grassland around the arrays is unlikely to perform the same function as undrilled areas in winter crops (which ensure there are areas which are not too dense or high for skylarks to access). Skylarks require long, unbroken sightlines; but the solar panels reduce the openness of the landscape and therefore reduce the desirability of the area for nesting skylark due to perceived risk of predation. Post construction monitoring of over 100 solar farms in England and Wales found no evidence of nesting skylarks (In Practice, CIEEM Issue 117, Sept 22). It is therefore considered likely that the construction of the new solar farm would result in the loss of the local skylark population. This would have a significant impact on a priority species.	Skylark were the most frequently observed red list bird of conservation concern recorded using solar farms during extensive bird monitoring completed by the University of Lancaster and partner organisations (SEUK-Solar-Habitat-2025-3.pdf) occurring at 59% of solar sites surveyed. Although skylark are unlikely to nest within the panel arrays, the combination of conservation grazing and skylark plots will enable enhanced foraging through the provision of a diverse habitat structure, including areas of bare ground/short vegetation. The plots are therefore not provided as nesting habitat but to ensure that skylark nesting in the surrounding landscape and areas of open grassland on site (the archaeology areas) have sufficient foraging habitat available to improve the breeding success rate. Skylark plots function in an arable setting by providing an open area of habitat for birds to forage in as crops become too dense for them to reach the ground. As such, although it is acknowledged that skylark are unlikely to breed within the panel areas, the plots provide areas of open habitat within which they can feed.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Ancient Woodlands (Habitat) 7.4.26 There are several Ancient woodlands within and adjacent to the site; ancient woodlands are irreplaceable habitats, and any deterioration of these habitats must be for wholly exceptional reasons and unavoidable. Current mitigation measures state a minimum of a 15m buffer will be retained to ancient woodland areas in line with NE guidance however it should be noted that The Woodland Trust recommends at least a 50m buffer (Planning for ancient woodland: planners manual for ancient woodland and veteran trees, July 2019) unless otherwise justified. This is best practice to reduce the impact of edge effects and given the presence of Annex II bat species associated with woodland (maternity roosts for both Bechstein's and Barbastelle bats) and uncertainty of the impact of a solar farm of this scale next to Ancient woodland any deviation from best practice should be fully justified.	The minimum 15m buffers to ancient woodland have been set according to Natural England and government guidance. As such, these are considered appropriate to protect the woodland itself. If additional buffers are necessary due to the requirements for greater offsets to protect bats, then these will be incorporated. Work to determine the location of such buffers is ongoing and will be submitted into the Examination once complete. The Woodland Trust often request a 50m buffer, in the project arborists experience, this level of buffer has never come to fruition, as its scale has never been required to protect woodlands suitably. This should be kept in mind, especially with regards to the low impact of the operational phase of the solar farm	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Trees 7.4.27 An assessment of the impacts of the proposed development on ancient and veteran trees is essential. 7.4.28 The OHA have reviewed the Strategic Arboricultural Impact Assessment & Method Statement Parts1-4 **[APP-145, APP-146, APP147 and APP148]**, but consider this to be inadequate. 7.4.30 The OHA consider that without a detailed survey of all trees and woodlands adjacent to all works that have the potential to impact on these features, it is not possible to make an accurate and detailed assessment of the arboricultural impact of the proposed development. 7.4.31 Furthermore, as shown within the report **[APP-145]**, between sections 5.13 – 5.17,	Upon consent, when detailed / construction stage designs are available, full tree surveys will be able to be scoped. At present, the completion of full, site wide surveys would collate a vast amount of data, nearly all of which would not relate to an area which would likely receive an arboricultural effect. A site wide tree survey (bearing in mind the precautionary approach to solar panel design and cable routing already, applying buffers to these features) is not proportionate to the likely possible effects or impacts to trees. Once areas of concern or potential impact are known (i.e. detailed design stage) targeted tree surveys and impact assessment can be scoped accurately and completed.	Local Ecology and Nature

Name	Comment	Applicant's Response	Issues
	each section (1-5) has the potential to have significant impacts, particularly the high voltage cables, where it states tree removal will be most likely.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.32 The report also refers to Ancient Woodland in section 2.23 and the requirement to provide suitable buffers in accordance with Forestry Commission and Natural England standing advice. 15m is a minimum requirement for ancient woodland buffers. . The OHA suggest a 50m buffer is therefore applied as per the Woodland Trust's Planning for Ancient Woodland: Planners Manual for Ancient Woodland and Veteran Trees July 2019.	The minimum 15m buffers to ancient woodland have been set according to Natural England and government guidance. As such, these are considered appropriate to protect the woodland itself. If additional buffers are necessary due to the requirements for greater offsets to protect bats, then these will be incorporated. Work to determine the location of such buffers is ongoing and will be submitted into the Examination once complete.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.33 It is noted that the applicant has undertaken a Veteran Tree Survey **[APP-164]** which sets out the importance of ancient and veteran trees and provides a description of them. Clarification should be provided on whether this survey includes both ancient and veteran trees, as early on in the report it refers to these separately, whereas in the survey section it refers only to veteran tree data. If ancient trees were not recorded as part of this survey, a further survey is required.	Yes, the survey reviewed both veteran and ancient trees.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.34 Clarification is also required on whether this survey included all ancient and veteran trees located off the site outside the redline boundary, where their buffer extends into the site. 7.4.35 Whilst the information within the Veteran Tree Survey **[APP-164]** is helpful in demonstrating the location of veteran trees within the site, without it being included within an arboricultural impact assessment, and which clearly provides accompanying plans showing all works proposed in relation to the tree's locations, it is again not possible to accurately assess the impact of the works on these trees.	The veteran tree survey did review trees beyond the red line, to a degree where a veteran trees (potential) buffer may incur upon the scheme and have a measurable impact. For instance, trees deep within woodlands were not surveyed, as their buffers would be less than or at least equal to the buffers assigned to woodland edges already.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.36 It is not clear from information submitted where the exact routes of the high voltage cables will be located. From reviewing various plans within the report, it appears to show a wide route located within the roads. However, more specific details of exact locations are required before a detailed arboricultural impact assessment can be made, as locating the cable route in verges would be completely unacceptable due to the significant impact that would have on the roots of a very significant number of trees that are located adjacent. The routes for cabling between the separate blocks of solar panels also do not appear to be shown on plans. Therefore, the impact of these works is unknown and has the potential to be very significant. 7.4.37 There also appears to be various areas on the plans where the route for the cables will have significant impacts to tree root protection areas (RPAs), that would appear avoidable by relocating the route to avoid RPAs. Whilst the specific routes have not been confirmed, it has the potential to impact on the following trees, where its shown within the RPAs of the following trees as identified in **[APP-146]** and **[APP-147]**. Plans to the South of Tree Survey (Page 13 of 16) also appear to be missing and therefore, the impact of the route for cables further South is not defined.	The precise alignment of cables within cable route corridors is not yet known. These would be subject to a wide range of detailed design inputs. The current arboricultural reports consider a wider corridor, and the potential impacts of this wider corridor; therefore guiding future designs, allowing or arboricultural elements to be part of the detailed design constraint inputs.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.38 The Tree Protection Protocol found at Appendix C **[APP-148]** requires amending and supplementing with additional information to ensure it is more site specific. Individual tree protection plans must be provided for all sites, so it is clear to the construction team, where exactly tree protection barriers, ground protection, utility routes etc is to be located. This is also a requirement as set out at Table B.1 of BS 5837:2012 and is standard practice for protecting trees during construction works. 7.4.39 The Tree Protection Protocol Scenario 6 is not acceptable. Using machinery to excavate within RPAs is likely to lead to excessive and adverse arboricultural impacts, contrary to section 7.2.1 of BS 5837:2012 which states 'To avoid damage to tree roots, existing ground levels should be retained within the RPA. Intrusion into soil (other than for piling) within the RPA is generally not acceptable, and topsoil within it should be retained in situ. However, limited manual excavation within the RPA might be acceptable, subject to justification. Such excavation should be undertaken carefully, using hand-held tools and preferably by compressed air soil displacement'. NJUG Volume 4 also provides guidance for installing utilities within proximity to trees. 7.4.40 Similarly, Tree Protection Protocol Scenario 9 is not acceptable. Strip foundations within the RPA of trees can lead to extensive root loss and should be avoided. Machinery for excavating in RPAs should also be avoided.	A revised Tree Protection Protocol will be submitted to the Examination to pick up the changes to the scenarios requested by the OHA.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Operational impacts on wetland birds and aquatic invertebrates: The 'Lake Effect' 7.4.41 No assessment has been provided of the potential effects during operation of the solar farm on wetland birds and aquatic invertebrates. The Zone of Influence for the assessment should take this into account, particularly given the proximity of large waterbodies of value to birds in the wider area, including Farmoor Reservoir, Cassington Gravel Pits, Blenheim lakes, and in the wider area, Otmoor and the Lower Windrush Valley complex. An understanding of the use of the wider landscape by wetland birds and aquatic invertebrates is needed to assess how the solar panels might influence behaviour of these species (evidence suggests that the polarised light	The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 **[PDB-008]**. A review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. This evidence was relied upon by the applicant of the 360ha Cleve Hill Solar Farm NSIP in north Kent, a site that sits directly adjacent to the Swale Special Protection Area (SPA), i.e. in a far more sensitive location with respect to birds than the Botley West Solar Farm. It was also accepted by Natural England, PINS and the Secretary of State at the time that scheme was consented.	Local Ecology and Nature

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	of solar panels can be confused by these species for open water) and consequent impacts on their populations through mortality or reduced breeding success.	Research in the United States found some evidence that suggested such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations, for example by Solar UK and the University of Lancaster studying 124 active solar sites across the UK. No evidence has been published from this work or others demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general when managed for wildlife (e.g. Copping *et al.* 2025). In addition, one of the mechanisms put forward for why a lake effect might occur relates to how solar panels reflect polarised light. Water has an albedo of between 3 and 8% of incident light which is similar to that of glass and panels covered with glass; such panels would reflect similar amounts of light and there is therefore a mechanism by which a lake effect may operate (not withstanding that such an impact has not been demonstrated in a UK setting. However, the panels the Project would use are covered with a specific anti-reflection coating that reflects circa 0.5-1.5% of light. They would therefore appear far darker than any surrounding water and would not exhibit the variations in reflection that a water surface would have; they do not move like water does (a lake's surface will always be in motion due to wind except on very still days). So side by side, solar panels and a lake would look very different in the UK where days without wind are few.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Required Mitigation and Enhancements 7.4.42 Measures to avoid, minimise and compensate for ecological impacts from the surface infrastructure and of the cable route will be required, as well as enhancement measures both to achieve BNG and deliver enhancements for species.	As described in ES Chapter 9 **[PDB-008]**, the majority of cable routes will be either within existing carriageway or across arable fields. During detailed design, where routes potentially interact with trees, the submitted strategic arboricultural impact and method statement adopts a precautionary approach to determining root protection areas (RPA) and provides the methods which should be employed when working near to trees. With respect to BNG, as set out in ES Appendix 9.13 BNG Statement **[APP-162]**, the BNG assessment *'…does not consider the cable route corridors between the sites as these are either within arable land or the highway network. Since both of these habitats can readily be restored post-construction and the period of construction is less than two years, as per the BNG Guidelines (Gov.uk 2024), no BNG assessment has been completed for the cable route corridors. This position was also agreed with Natural England during pre-submission consultation*.'	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Bats 7.4.43 The Environmental Statement concludes that the impact on the local bat population will be negligible on the basis that all landscape features that are used by foraging, commuting and roosting bats will be retained and protected by buffers (paragraphs 9.9.131 to 9.9.135 of **[APP-046]**). However, very little information has been presented regarding proposed avoidance or mitigation measures in relation to bats, particularly Bechstein's and Barbastelles. Mention is made of provision of a suitable buffer to protect all important bat flightlines being incorporated into the 'detailed masterplan' (commitment 9.20 of Table 9.8.1 of **[APP-046]**). However, important bat flightlines are not identified in the Illustrative Masterplan **[APP-062]**, or other documentation including the oLEMP **[APP-235]**, outline Operational Management Plan (oOMP) **[APP234]** or outline Code of Construction Practice **[APP-232 and APP-233]**. What would be considered a 'suitable' buffer in terms of size has not been defined, even though this would potentially affect the layout of the solar panels. The landscape features used by foraging commuting and roosting bats need to be identified for protection on relevant plans, with appropriate buffers defined in terms of buffer width and proposed management in order to ensure that these are implemented as part of the DCO.	Further survey work and data gathering was completed in 2024 and is the subject of on-going discussion with Natural England. Data will be provided to the Examination as a separate bat technical note soon as analysis is complete. This will include: • additional static detector recording (including in-field data); • full details of radio tracked bats (over-night tracking to generate home ranges, biophysical details, roost characterisation, flight line usage etc.); and • full details of trapping/radio tracking to be completed in May 2025. It is intended that these data, combined with that submitted in with the application (ES Appendix 9.4 Bat Survey Report **[APP-153])** will inform refinement 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), based on survey data available at the time and conservative, reasonable worst case scenario assumptions. Data will also be used to address Natural England's other concerns with respect the bat survey data and impacts to bats, a. Discussions between the Applicant and Natural England with respect to the use of these data for this commitment are on-going.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.44 The Environmental Statement indicates that gaps to be created in hedgerows are mostly <5m and unlikely to cause change in foraging/commuting habitat (paragraph 9.9.132 of **[APP-046]**). However, again no information is presented in terms of which hedgerows are important bat flightlines to justify this conclusion. Important bat flightlines need to be identified for protection on relevant plans, and creation of gaps in vegetation along these flightlines avoided or mitigated.	Further information with respect to bat flightlines and those considered to be of importance will be presented within the Bat Technical Note to be submitted to the Examination once analysis is complete.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.45 It is noted that Table 1.1 (documents to support the implementation of the CoCP) of the outline Code of Construction Practice (oCoCP) **[APP-232]** includes a commitment to produce a construction artificial light emissions plan, however no specific link is made between this and particularly sensitive features for bats, or bat flightlines	As set out in section 1.8.17 of the oCoCP, '*lighting during construction will take into account the requirements set out within the guidance on bats and artificial lighting at night (Bat Conservation Trust (BCT) and Institution of Lighting Professionals (ILP), 2023). Lighting units will be designed to minimise illumination outside the construction works area e.g., accessories such as hoods, cowls and shields will be used to direct light to the intended area only. Lighting*	Local Ecology and Nature

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		will also be task orientated and where possible, fully shielded and will include directional beams, non-reflective surfaces and barriers and screens. As such, lighting during construction will be designed to avoid spill onto all hedgerows and other linear features that may be potential foraging and commuting corridors that may be used by bats.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Otter and Water Vole 7.4.46 Surveys for these species are required to inform avoidance, mitigation and compensation measures. Without this information it is not possible to advise on appropriate measures.	Although not surveyed for specifically, otter have been recorded using the Evenlode and it is possible that water vole may also be present. Therefore, both species were considered as receptors within ES Chapter 9 Ecology and Biodiversity **[APP-046],** otters as an explicit IEF and, as set out in section 9.6.77 of ES Chapter 9, water vole by virtue of their potential presence within water bodies. This assessed the potential impacts of the Project on both species, including with respect to potential disturbance during construction. The conclusion of that assessment was that while there may be some short term and localised disturbance from noise at a distance to these species, there would be no significant effect from any potential impact. This conclusion took account of the use of appropriate buffer zones around water courses and water bodies along with hedgerows and other linear features that might be used by commuting or sheltering otter. The Project retains all water courses and hedgerows with appropriate buffers. It also does not result in the loss of any woodland and maintaining connectivity between woodlands and water course features is ensured within the masterplan through the provision of the buffers around water courses, hedgerows etc. Indeed, the masterplan would improve connectivity between these features compared to the baseline as the majority of the fields present across the Project site have little or no field margin. Once built, the Project would provide a minimum of 5m of margin either side of all hedgerows. The use of a buffer zone of between 3-5 m from the toe of banks around water courses to avoid impacts to water vole is recommended within the Water Vole Mitigation Handbook (Dean *et al* 2016). The Project includes buffer zones of at least 8m from all watercourses, well above this recommended minimum. As such, the Applicant does not agree that further surveys for water vole or otter are necessary since all impacts are avoided. The Project includes enhancement with respect to both species through the provision of the buffer zones and the enhanced Evenlode Corridor. Some of the smaller water courses on the Project site are currently farmed up to the top of the embankment and will be subject to agricultural run-off from fertiliser and other chemical additions. The removal of these agricultural inputs and the provision of a much wider buffer along the top of the bank will help ensure that both species are protected and their aquatic and terrestrial habitats enhanced.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Great Crested Newts 7.4.47 The licensing options for the development have been kept open, in terms of applying for a Natural England mitigation licence or using the NatureSpace District Licensing Scheme. 7.4.48 We strongly recommend that the District Licensing Scheme should be used to ensure a robust impact assessment and provision of off-site compensation if needed. 7.4.49 Use of the District Licensing Scheme can be secured via the appropriate wording from the standard planning conditions and translated into planning requirements within the DCO. NatureSpace should be consulted for their comments to inform the Examination to understand the details of the likely impacts to this species.	At this stage, a traditional great crested newt licence from Natural England is being sought. The Applicant is engaging with Natural England to achieve this.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.50 It would be beneficial to improve the habitat for GCN in the scheme area through biodiversity enhancements including provision of more ponds and connected terrestrial habitat.	The Project includes the delivery of terrestrial habitat enhancement for the local GCN population through the provision of enhanced grasslands within the panel areas, archaeological protection areas and buffers compared to the intensive arable baseline.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Farmland Birds 7.4.51 The timing of cutting of grassland should not include April if the intention is to provide skylark nesting habitat as they typically nest on the ground between April and June. 7.4.52 It is recommended that evidence and research of the efficacy of leaving 5mx5m bare plots in solar array fields, in mitigating for losses to farmland birds, is included in the justification and that these features are not relied on as the main mitigation for farmland bird species. An alternative option to provide foraging habitats may be to manage the grassland habitat beneath and around the solar arrays to provide a diverse structure including tussocky areas that are left uncut for 2-3 years, short-sward grassland and areas of bare ground that could be disturbed. However, this would not mitigate the loss of suitable nesting habitat.	Timing of the cutting of grass has been amended to make it clear that no cutting will take place during the nesting bird season in the Rev1 version of the oLEMP submitted at Deadline 2. Skylark were the most frequently observed red list bird of conservation concern recorded using solar farms during extensive bird monitoring completed by the University of Lancaster and partner organisations (SEUK-Solar-Habitat-2025-3.pdf) occurring at 59% of solar sites surveyed. Although skylark are unlikely to nest within the panel arrays, the combination of conservation grazing and skylark plots will enable enhanced foraging through the provision of a diverse habitat structure, including areas of bare ground/short vegetation. The plots are therefore not provided as nesting habitat but to ensure that skylark nesting in the surrounding landscape and areas of open grassland on site (the archaeology areas) have sufficient foraging habitat available to improve the breeding success rate. Skylark plots function in an arable setting by providing an open area of habitat for birds to forage in as crops become too dense for them to reach the ground. As such, although it is acknowledged that skylark are	Local Ecology and Nature

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		unlikely to breed within the panel areas, the plots provide areas of open habitat within which they can feed.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.53 The OHA recommend development of a farmland bird strategy for the proposed development, which should consider the need for off-site measures as well as incorporating features for the full range of wintering and breeding birds affected by the scheme. Such an approach could be secured through a requirement for submission of a Farmland Bird Strategy, but since delivery is needed off-site then a legal agreement is likely to be necessary. There are existing successful local schemes working with landowners on improving habitats for farmland birds, which might be able to support delivery. Options could include securing measures to increase the carrying capacity of surrounding farmland for farmland birds, including skylark, either on other landholdings under the applicant's control or through funding facilitation work with nearby landowners and organisations to deliver such measures.	The Applicant does not consider that a dedicated Farmland Bird Strategy is necessary. Recent research has demonstrated the benefits of solar sites for farmland birds managed for biodiversity benefit, that contain a diverse range of habitats (Copping *et al*. 2025). Following that research, it is likely that the Project will provide an overall enhancement for the majority of such birds compared to the arable baseline. The Project will provide 36ha of new grassland that will be managed specifically for nesting birds, including skylark, within the unpanelled areas to protect buried archaeology. In addition, the area of the Project where panels are to be removed as part of Project Change Request 2 will also be managed in this manner (a further circa 17ha). The provision of the skylark plots in addition will provide enhanced foraging habitat during the nesting season to ensure that the population of skylark on the Project site can continue to nest across the area. Therefore, no off-site habitat provision is considered necessary.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Lake Effect 7.4.54 There is no discussion within the documents of the potential 'lake effect' caused by the solar panels, its potential impacts and how this could be ameliorated. There are a number of options for reducing this effect, which should be informed by such an assessment. It is likely that options to reduce the effect should be considered particularly in those areas closest to wetland habitat of value to birds and invertebrates.	The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 **[PDB-008]**. A review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. This evidence was relied upon by the applicant of the 360ha Cleve Hill Solar Farm NSIP in north Kent, a site that sits directly adjacent to the Swale Special Protection Area (SPA), i.e. in a far more sensitive location with respect to birds than the Botley West Solar Farm. It was also accepted by Natural England, PINS and the Secretary of State at the time that scheme was consented. Research in the United States found some evidence that suggested such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent. Solar sites within the UK are also very well studied with respect to their bird populations, for example by Solar UK and the University of Lancaster studying 124 active solar sites across the UK. No evidence has been published from this work or others demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general when managed for wildlife (e.g. Copping *et al*. 2025). In addition, one of the mechanisms put forward for why a lake effect might occur relates to how solar panels reflect polarised light. Water has an albedo of between 3 and 8% of incident light which is similar to that of glass and panels covered with glass; such panels would reflect similar amounts of light and there is therefore a mechanism by which a lake effect may operate (not withstanding that such an impact has not been demonstrated in a UK setting. However, the panels the Project would use are covered with a specific anti-reflection coating that reflects circa 0.5-1.5% of light. They would therefore appear far darker than any surrounding water and would not exhibit the variations in reflection that a water surface would have; they do not move like water does (a lake's surface will always be in motion due to wind except on very still days). So side by side, solar panels and a lake would look very different in the UK where days without wind are few.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Ancient Woodland (Habitat) 7.4.55 In line with best practice, 50m buffers to ancient woodland should be identified on the Masterplan, and appropriate management of these buffers set out in the oLEMP. Any deviation from this best practice approach should be fully justified.	The minimum 15m buffers to ancient woodland have been set according to Natural England and government guidance. As such, these are considered appropriate to protect the woodland itself. If additional buffers are necessary due to the requirements for greater offsets to protect bats, then these will be incorporated. Work to determine the location of such buffers is ongoing and will be submitted into the Examination once complete. 50m buffers are disproportionate to the likely level of construction & operational impacts of the solar scheme upon woodlands.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.56 The siting of panels between and around the areas of Ancient woodland within the central site not only risks deterrent effects for wildlife but also constitutes a lost opportunity for providing connectivity with habitat corridors between these areas of woodland which could have brought substantial benefits. As currently proposed the solar farm would essentially end up "locking" these woodlands up for the lifetime of the development (42 years) with no potential for expansion or connectivity. These areas are included in the draft Local Nature Recovery Strategy mapping and connecting habitats could have a significant positive impact, not least for the rare bat species that have been found roosting in the woodlands (see comments under Biodiversity Net Gain). The 50m buffer area would provide suitable space for natural regeneration and expansion of the woodlands with an opportunity to allow for natural succession, which would benefit many invertebrates, birds and other species. A larger buffer may be required in order to	The ancient woodland adjacent to the Project site is currently surrounded by intensively-managed arable fields with no field margins; fields are cultivated up to the edge of the woodland. As such, the provision of any unploughed area that is no longer subject to agricultural chemical inputs (i.e. the 15m buffer currently incorporated into the Project) represents an enhancement over the current situation of the woodland. The location of additional buffers relating to the protection of bats using the site is the subject of on-going work and will be submitted into the Examination once complete.	Local Ecology and Nature

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	fully connect the woodlands in some locations. This opportunity must be explored further, otherwise the opportunity for significant contributions towards local nature recovery and climate resilience would be missed.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Trees 7.4.57 Additional arboricultural information is required: • An updated detailed arboricultural survey, in accordance with BS 5837:2012 of all trees and woodlands adjacent to all works that have the potential to impact on these features. As currently the report only covers trees adjacent to cable routes. The survey should include trees and woodlands adjacent to all other works and all other parts of the site, including the photovoltaic (PV) solar farm and associated infrastructure. • The arboricultural survey would need to be completed to determine the presence and the precise location of all veteran or ancient trees that may be present on the site. The survey should also include all ancient and veteran trees located off the site outside the redline boundary, where their buffer extends into the site. As this does not appear to have been carried out in the current report. For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. • An updated detailed arboricultural impact assessment once the above surveys have been completed, to cover all works, including the exact location of cable routes. • An updated Arboricultural Method Statement (Tree Protection Protocol) in accordance with BS 5837:2012, to address the above comments, and also to include individual Tree Protection Plans, in accordance with BS 5827:2012 must be provided for all the sites. • The above information may then require changes to the design and layout of the development to avoid identified arboricultural impacts	Upon consent, when detailed / construction stage designs are available, full tree surveys will be able to be scoped. At present, the completion of full, site wide surveys would collate a vast amount of data, nearly all of which would not relate to an area which would likely receive an arboricultural effect. A site wide tree survey (bearing in mind the precautionary approach to solar panel design and cable routing already, applying buffers to these features) is not proportionate to the likely possible effects or impacts to trees. Once areas of concern or potential impact are known (i.e. detailed design stage) targeted tree surveys and impact assessment can be scoped accurately and completed. Veteran (and ancient) tree survey has been completed, with appropriate buffers provided which accord with recognised Natural & Forestry England guidance.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Biodiversity Net Gain 7.4.58 We welcome the commitment to deliver biodiversity net gain above the minimum mandatory requirement of 10% due to come into force for NSIPs in 2026 We note that the statutory metric has been used to calculate biodiversity net gain in line with the recommendations in Section 4.6 of EN-1, reporting a predicted 80.80% net gain in habitat units and 57.93% net gain in hedgerow units. 7.4.59 It is notable that no calculation has been made of baseline or post development watercourse units. According to the Statutory Metric User Guide, if the site boundary crosses into the riparian zone (as is the case for this scheme), all adjacent lengths of watercourses should be included in the watercourse module. To achieve overall Biodiversity Net Gain, gains need to be demonstrated across all unit types (hedgerows, area habitats and watercourses). This requirement has also been noted by Natural England in their Relevant Representation (see page 11 of **[RR-0761]**) and by the Environment Agency (see page 16 of **[RR-0308]**).	The necessary survey work to complete the water course component of the BNG calculation is on-going and will be submitted into the Examination, along with a revised BNG calculation within an updated ES Appendix 9.13 Biodiversity Net Gain Assessment that includes the water course element by Deadline 3.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Biodiversity Net Gain 7.4.60 It is noted that no delay in starting habitat creation has been included within the temporal multiplier for the metric, although it is understood that the construction period is two years. Clarification is sought as to whether there will be any delays in habitat creation.	Although the total build programme for the Project is circa two years, works within any given field will be significantly shorter (<1 year). On this basis, habitat creation will be <1 year after impact and, as such, no temporal multiplier is necessary.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.61 The grassland proposed between the panels is uniform across the site in its choice of seed mix; the primary purpose of which seems to be to provide grazing. There should be at least some areas where grassland of higher value to wildlife is prioritised. Wildflower meadow grassland between arrays would give a much greater benefit to invertebrates and other species. 7.4.62 The margins of habitat which are not within the arrays similarly propose somewhat uniform habitats and grass mixes throughout the whole area. 7.4.63 Each field should be considered on its own merits and its local context and the most appropriate habitat to maximise value to biodiversity should be considered (taking into account suitability of soils). This is likely to differ between areas of the project site and would give a mosaic of habitat types for these margin areas bringing a much greater wildlife benefit.	As set out in section 7 of the oLEMP **[APP-235]**, the aim of the seeding across the panel areas is to provide a diverse sward, both in terms of structure and composition that is managed through grazing at conservation stocking rates; it is not intended to provide a sward where grazing and associated livestock production is the aim. Also as set out in section 7 of the oLEMP, the areas of the site that have are to be left undeveloped to protect significant buried archaeological remains (currently 36ha) will be sown with a species-rich grassland and managed as wildflower meadow, primarily to benefit breeding/wintering birds, but will also support other wildlife. Although indicative seed mixes are provided in Appendix B of the oLEMP, as set out in section 1.1.4 of the oLEMP each individual LEMP will set out the planting arrangements for the area of the Project to which it relates. As such, there is scope for variations in planting, as dictated by the local soil conditions.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.66 The planting should also reflect the presence of priority species, including food plants for caterpillars and foraging resources for birds. Consideration of the draft LNRS species priority list, and a data search for species in the local area would provide a starting point. For example, Wych elm in hedgerows for White-letter hairstreak, Barberry for the Barberry carpet	The Project has been designed following the Oxfordshire Nature Recovery Network (ONRN), a precursor to the LNRS which was published after the Project was submitted for Examination. The Applicant will work with the Host Authorities to ensure that the final LEMPs that will be	Local Ecology and Nature

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	moth, etc. 7.4.67 In the Northern area there is a watercourse running through the arrays. More could be done here to take this into account and create meaningful buffers and habitat areas linked to it.	submitted for each phase of the work support the goals of the emerging LNRS through species choice, for example.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.69 The aim of the Applicant's scheme, to establish a landscape-scale wetland corridor along the River Evenlode (see page 6 of **[APP-162]**), is welcomed, and aligns with the priorities and mapping in Oxfordshire's emerging LNRS. Conservation Organisations with local knowledge should be involved in the design of the Evenlode wetland corridor for the best outcome.	The Applicant notes and welcomes the alignment of the Evenlode Corridor with the emerging LNRS. It is intended that local conservation organisations will be involved in the final design of the corridor to ensure that local knowledge is incorporated.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.70 It is noted that hedgerow planting is planned to provide connectivity between Tackley Wood and the Blenheim Estate, Bladon and Burleigh Woods. While this is welcomed, we would suggest that the potential to expand hedgerow and woodland buffers for wood-pasture creation or natural woodland regeneration in this area is explored to provide greater woodland connectivity, aligning with mapped measures in the emerging LNRS, and supporting the important bat populations identified through the surveys.	Further details of the proposed design of the buffers to be created to support the bat population in the area around the Project will be set out in the bat technical note.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.71 The species surveys flagged the presence of some very rare/under-recorded specie for the County, notably the Bechstein and barbastelle bats at Bladon Heath and Burleigh Woods, but the presence of nightingale and dormice is also significant with both species recorded in very low numbers in Oxfordshire. Identification of habitat creation measures specifically aimed at supporting these species would be welcomed.	Section 7 of the oLEMP **[APP-235]** sets out that the Project will create over 26km of new hedgerow and 5ha of new woodland. Both features will provide significant new habitat for dormice and will also support nightingale.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.72 The oLEMP **[APP-235]** refers to provision of bee hives (paragraph 10.2 (River Evenlode Corridor), fourth bullet; paragraph 10.2 (Wildflower Meadow Grasslands), third bullet; paragraph 10.2 (Woodlands), final bullet; and paragraph 11.8.1); we would question whether this is an appropriate measure for biodiversity benefit. Honeybees are not native to the UK, and would potentially compete with native pollinators (such as bumble bees, solitary bees, butterflies and hoverflies) for nectar sources. However, the diagram of the 'bee hive' provided in Appendix A (figure 4) to the oLEMP would be better described as a 'insect hotel' than a bee hive. Clarification is therefore sought as to what the proposed provision is for pollinators. A more appropriate measure to support declining native pollinator species would be to include specific planting for pollinators in edge habitats, similar to measures to provide nectar species under Countryside Stewardship5	The bee hives will be in accordance with those identified in Appendix A of the oLMEP **[APP-235]**, providing habitat for native invertebrate species. The terminology has been amended in the version of the oLEMP submitted at Deadline 2 to refer to bee hives as 'insect hotels' to avoid confusion. With respect to pollinators, the Project will contain significant new meadow grassland with wildflowers for invertebrates, and pollinators in particular, as outlined in the oLEMP **[APP-235]**.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Wider Environmental Benefits 7.4.73 Paragraph 4.6.15 of EN-1 states that "applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design…" It is not immediately apparent that such a statement has been submitted with the application. 7.4.74 Some information on wider environmental benefits is included with the draft Oxfordshire LNRS documents, and we are seeking to reflect this further in the Local Habitat Map prior to publication. Work undertaken by Oxford University has mapped natural capital baselines and natural capital opportunities across Oxfordshire and would provide a good starting point for considering priorities for delivery of wider environmental benefits through the scheme	The benefits of the Project with respect to ecology are set out in Section 7 Ecology Strategy of the oLEMP **[APP-235]**. This defines the ecological vision for the Project and is based on incorporating the aims of the Oxfordshire Nature Recovery Network, the forerunner of the emerging Oxfordshire LNRS.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Long term management and monitoring 7.4.75 Paragraph 5.4.44 of EN-1 5.4.44 states that "any habitat creation or enhancement delivered … for compensation or biodiversity net gain should generally be maintained for a minimum of 30 years or for the lifetime of the project, if longer". The oLEMP **[APP235]** mentions monitoring for 30 years (paragraph 15.1.5) but elsewhere references monitoring for the lifetime of the project (paragraphs 1.1.10 and 17.1.1). Clarification and correction of the documents is therefore suggested to confirm that management, and monitoring should be undertaken for the lifetime of the project as a minimum. We would encourage the ongoing management of habitats created for compensation and biodiversity net gain beyond the life of the project.	The duration of habitat management to ensure that all documents refer to it being for the lifetime of the Project has been captured within a revised oLEMP submitted at Deadline 2.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.4.76 It is set out that the intention is for multiple LEMPs (covering different zones of the scheme) to be approved by districts prior to commencement; it is essential Host Authorities are adequately resourced and funded to do this. The same point applies to any requirement which must be discharged by a Host Authority. Ideally, OHA would prefer the approach whereby one District Council takes the lead role on approving the documents for discharge of the requirement, in consultation with the other councils, as this would mean a better overview, with only one LEMP needing to be produced for the whole project area (or for each phase of the project).	The discharge of Requirements is a statutory function of the host authorities and, as such, it is not the role of the Applicant to fund this. However, the Applicant has had a Planning Performance Agreement (PPA) with the host authorities to cover their input of the Project to submission and are in the process of agreeing one to cover input to the Examination. They may, therefore, look to extend this to cover post consent Requirement discharge etc. In addition, the Applicant is keen to work with the host authorities to ensure that the most streamlined approach to the discharge of Requirements is achieved.	Local Ecology and Nature

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Joint Local Impact Report of CDC, VWHD, WODC and OCC	DCO Requirements and legal obligations 7.4.77 Suggested amendments to wording of requirements in bold typeface: - Biodiversity net gain: (2) The biodiversity net gain plan must be substantially in accordance with the outline landscape and ecology management plan and **biodiversity net gain statement** and must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates.	The Applicant does not consider that the amendment to the wording of this Requirement is necessary since the BNG to be delivered relies on the designs within the oLEMP, as set out in section 9.1.2 the oLEMP, '*the conclusions of the BNG Statement with respect to the total BNG to be delivered by the Project rely on the landscape designs and other measures set out in within this oLEMP*'. Therefore, since the oLEMP is already secured by Requirement, there is no need to also then include the BNG Statement in that requirement since the latter is reliant on the former.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	DCO Requirements and legal obligations 7.4.77 Suggested amendments to wording of requirements in bold typeface: Code of construction practice - (1) No part of the authorised development may commence until a code of construction practice for that part has been submitted to and approved by the relevant planning authority, such approval to be in consultation with the planning waste authority and the relevant highway authority. (2) The code of construction practice must include the following plans; (a) construction traffic management plan; (b) public rights of way management strategy; (c) soil management plan; (d) site resources and waste management plan; (e) dust management plan;Code of construction practice: (f) **Construction environmental management plan** (f) Construction environmental management plan (3) The code of construction practice and any plans to be included within the code of construction practice pursuant to sub-paragraph (2) must be substantially in accordance with the outline code of construction practice. (4) The code of construction practice must be implemented as approved. (5) For the purposes of sub-paragraph (1), "commence" includes part (c) (works in relation to construction compounds and accesses to construction compounds (including above and below ground site preparation for temporary facilities for the use of contractors)) of the permitted preliminary works.	The Applicant does not consider that a separate Construction Environmental Management Plan is necessary since the content that would form such a document will already be present within the CoCP (management of noise, pollution, ecology constraints etc.).	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	DCO Requirements and legal obligations Landscape and ecology management plan 6 1) 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. (2) The landscape and ecology management plan must be substantially in accordance with the outline landscape and ecological management plan. (3) The landscape and ecology management plan must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates. (4) For the purposes of sub-paragraph (1), "commence" includes part (h) (site clearance (including vegetation removal, demolition of existing buildings and structures)) and (i) (advanced planting to allow for an early establishment of protective screening) of the permitted preliminary works.	Please clarify any specific comments or amendments sought to the oLEMP as this is the wording currently within the draft DCO.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	DCO Requirements and legal obligations Farmland Bird Strategy 7.4.78 A requirement for submission of a Farmland Bird Strategy should be included, but since delivery is needed off-site then a legal agreement is also likely to be necessary.	The Applicant does not consider that a separate Farmland Bird Strategy is necessary with all mitigation necessary delivered within the Project site.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	DCO Requirements and legal obligations Great Crested Newt District Licence 7.4.79 If the District Licencing approach is to be used, appropriate wording from the standard planning conditions would need to be included in the DCO requirements.	At this stage, a traditional great crested newt licence from Natural England is being sought. The Applicant is engaging with Natural England to achieve this.	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	DCO Requirements and legal obligations Legal obligations 7.4.80 There is a need for monitoring of the ecological management and achievement of BNG habitat condition for the lifetime of the project. Therefore, a monitoring fee will need to be secured to fund the relevant LPA to review monitoring reports on an agreed frequency, and to undertake site visits. Local arrangements are already in place with LPAs for calculating BNG monitoring fees; payment of the monitoring fee would need to be secured through Section 106 agreements with the relevant LPA. 7.4.81 Given the need for a Section 106 agreement to secure the monitoring fee, it may be more appropriate that the Section 106 agreement also secures the delivery of the Landscape	The Applicant does not consider a further legal agreement is necessary to secure the oLEMP/BNG Plan as there is already a legal obligation on the Applicant to comply with the documents via Requirements 6 and 7 of the dDCO.	Local Ecology and Nature

Name	Comment	Applicant's Response	Issues
	and Ecology Management Plan and implementation of the Biodiversity Net Gain Plan. However, the OHA are also willing to consider how this could be secured via Requirements within the DCO. 7.4.82 A legal agreement would also be needed to secure off-site measures to compensate for impacts to farmland birds.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	DCO Requirements and legal obligations - With regard to trees and the draft DCO: • Article 38(6) (felling or lopping of trees and removal of hedgerows of the draft development consent order) **[APP-015]** states the undertaker may not "fell or lop a tree or remove hedgerows within the extent of the publicly maintainable highway without the prior consent of the highway authority". OCC as Highways Authority support this and consider it essential that written consent must be given by the Highway Authority before any works are carried out, including pruning, felling or works to tree or hedgerow roots, in relation to vegetation in the publicly maintainable highway. • With regards to article 39 (trees subject to tree preservation orders) and the general powers contained within article 38 to remove trees not protected by TPOs, the OHAs question the need for such a blanket power and would instead wish to see the article drafted in such a way where OHAs must give prior consent for the removal of any trees and hedges within the site. The OHA do not believe the applicant has adequately demonstrated why such a power is necessary.	The Applicant has updated the draft DCO at Deadline 2 to clarify that the prior "written" consent of the highway authority will be required. In relation to Article 39, 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 Applicant therefore maintains that the general power is suitably controlled. 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*".	Local Ecology and Nature
Joint Local Impact Report of CDC, VWHD, WODC and OCC	In order to be satisfied that there is no risk to the asset [Milestone on the Oxford Road (NHLE number 1181978)] during these periods it is suggested that should consent permission be granted for the scheme, a requirement is attached to any order which agrees, prior to commencement, protection measures to be installed during commissioning and again during decommissioning which protect the asset from any damage.	The Applicant's assessment of the likely impact on this Grade II listed milestone is as a result of change within its setting is presented in paragraphs 1.9.92 – 1.9.94 of ES Appendix 7.5: Settings Assessment **[APP-142]**. It concludes that there a likely effect of low adverse significance which would be short-term and fully reversible, occurring only during the period in which the 275kV cable would be laid within the B4044 Oxford Road as it passes the milestone. The milestone is located well away from the edge of the road, on the other side of the footway in a narrow verge adjacent to a hedge that encloses the garden of a house. The Applicant does not consider it necessary to add furtherr protection measures to be installed during construction and decommissioning beyond mitigation measures secured within the DCO. As set out in the outline Code of Construction Practice **[APP-232]**, control measures for managing construction noise and vibration associated with the Project will be implemented in accordance with the Construction Noise and Vibration Management Plan. In preparing the Management Plans, the Applicant has had regard to minimising, avoiding and mitigating effects on heritage assets including NHLE number 1181978. Noise and vibration from HDD works, which are more intrusive activities likely to give rise to the greatest level of effects amongst construction operations, would cause a low impact magnitude, as outlined in the Construction Phase Noise and Vibration assessment **[APP-212]**.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Red House Farm, a grade II listed farmhouse which lies to the northeast of the application site is noted as likely to suffer a Negligible Adverse impact. However, the manner of the agricultural countryside in which the building sits will be eroded by the presence of the proposed PV panels. An area of landscape enhancement is proposed to the north of the area in proximity to Red House Farm however this will only provide visual mitigation to some areas in the setting of the listed building. It will remain largely exposed. Hiding the scheme behind hedgerows and enclosing PRoW with high hedges will also significantly change the way in which the character of the agricultural landscape can be experienced. Although there is some intervening land remaining as an agricultural buffer to the farmhouse and farm group, the impact goes beyond negligible. The impact is Minor Adverse and should be outweighed by public benefits as per National and Local Policy Tests.	The Applicant's assessment of the likely impact on the heritage significance of the Grade II listed Red House Farmhouse is presented in paragraphs 1.9.95 – 1.9.97 of ES Appendix 7.5: Settings Assessment **[APP-142]**, with further details provided in the Revision 1 version of this document **[EN010147/APP/6.5]** which was submitted at Deadline 2. The assessment considers the wider rural setting of the farmhouse, particularly the land to the south. The nearest proposed solar PV panels would be 450 m from the farmhouse, therefore a sizeable buffer of this rural landscape would be retained. The Applicant maintains that the heritage significance of the farmhouse would be barely affected, therefore the correct likely magnitude of impact is 'negligible adverse', resulting in a long-term, reversible, 'negligible adverse' effect which is not significant in EIA terms. The Applicant agrees that this harm to the significance of the Grade II listed building should be weighed against the public benefits of the proposed development in accordance with national tests, specifically the test set out in paragraph 5.9.32 of NPS-EN1.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The lack of information about grid connections and the NGET substation which is anticipated to be very large and sited somewhere in or adjacent to the southern parcel substation is a concern. There is a real concern that the impacts will be entirely unmitigated due to necessity if the proposal is granted approval. It should therefore be proposed alongside this scheme in order that it can all be appropriately assessed with holistic mitigation used where possible.	Delivery of the NGET substation is a core element of the Project as identified in ES Chapter 6 'Project Description'. **[APP-043]**. Whilst its design, construction and operation will be entirely managed by National Grid, the assessment of the significance of environmental effects, based on a set of design parameters (as advised by National Grid) has been considered throughout the EIA.	Historic Environment

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		An approximate 4ha area of land is allocated in the Southern Site Area for delivery of the NGET substation. The NGET substation would serve and provide further opportunity for other projects to connect to the National Grid and would not be solely for the use of the Project. National Grid is exploring opportunity for development of the NGET on land outside of the Order Limits on land immediately to the west of the Project, as part of a separate application under the T&CPA 1990. This is to be confirmed, and the approach taken in the EIA has therefore been to also assess the cumulative impact of the NGET delivery and operation, based on the information that NGET had provided to the Applicant prior to submission. This is explained and considered in ES Chapter 20 'Cumulative Effects and Inter-relationships' **[APP-057].** Subsequent, alternative use, of the land within the Order Limits for the Applicant's own main Project Substation, and solar panels, as a fall back position to the location of the NGET sub-station being located to the west, is proposed to form part of a second Change Request to the ExA	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The Photomontages of Viewpoint 50 show a visualisation of the substations. The indicative scale of the Main and Secondary Substations (Work No.3a and 3b on the Works Plans) are very large structures in an area not characterised by built form of any real scale beyond historic farm buildings. It is clear even from these visualisations that this will result in a significant change to the character of the landscape and its contribution to nearby assets. The impact of this has not been fully assessed as specific plans do not appear to form part of this application. This forms a fundamental part of the overall proposal being a necessary part of the scheme for it to become operational. Likewise, the NGET connection is an absolute necessity for the scheme but there are no details provided other than the anticipated size of the building footprint. This will have a considerable impact on the character of the area but heritage impact assessment from detailed proposals has not been done.	The main Project substation and NGET substation have been considered and form part of the Landscape and Visual Impact Assessment (LVIA) **[APP-045]**. This is particularly evident at Representative Viewpoint 50. From where a significant adverse landscape and visual effect has been identified and acknowledged. At the time of writing the LVIA **[APP-045]**, there were no detailed plans available for the NGET substation, which is why an indicative area was shown on the visualisations. The heights were known however and for the purposes of the assessment, it was assumed that the structures would be similar to those of the main project substation, i.e. not a solid structure. Allowing glimpsed views of the landscape to the south. Where relevant, the location and likely scale of the National Grid Substation have been included within the assessment of likely impacts and effects presented in ES Appendix 7.5: Settings Assessment **[APP-142]**. This substation is mentioned in the assessment regarding Red House Farmhouse (paragraphs 1.9.95 – 1.9.97), Upper Whitely Farmhouse (paragraphs 1.9.98 – 1.9.100) and also Tumbledown Cottage (paragraphs 1.9.131 – 1.9.134).	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	An archaeological evaluation has been undertaken across the site which has identified a range of archaeological deposits including several significant sites that could be considered to be of demonstrable equivalent significance to a scheduled monument. These include a likely Roman Temple site, high status Bronze Age barrow, another Bronze Age barrow associated with a later Early Medieval cemetery, a Roman Villa and further aspects of the scheduled Roman Small Town at Sansom's Platt and its previously unidentified cemetery. The report for this evaluation has yet to be completed however and so the results have not been fully incorporated into the submitted Cultural Heritage chapter. As such the assessment of the significance of any heritage assets affected by this proposed development does not take into account the detailed data produced by the evaluation on the nature, date and level of survival of these archaeological heritage assets required to appropriately assess their significance. These sites are within the areas that have been proposed to be removed from any intrusive works and so will mainly be preserved within the development [non-intrusive planting areas]. Whether or not these non-intrusive planting areas are of an appropriate size to preserve important remains, and their setting, within the development will need to be based on the results of this evaluation. The need for the results of this field evaluation to be submitted to inform the assessment of the significance of the impact of these proposals and the suitability of the areas proposed for non-intrusive works is reiterated in Historic England's relevant representation **[RR-0398]**, particularly for the areas around the scheduled site at Sansom's Platt.	Evaluation reports setting out the results of the programme of trial trenching are currently being prepared. It is hoped that these reports will be submitted at Deadline 5.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Several proposed grid connection routes have not been subject to archaeological evaluation. These works could impact on currently unidentified archaeological deposits which could be of such significance to require physical preservation. Given that other, previously unknown, sites of such significance to require physical preservation have been identified within the scheme this has the potential to have a considerable impact on the viability of the scheme or would be a strongly negative impact on the historic environment. These areas will also need to be subject to archaeological evaluation before the impact of this proposed scheme on this significance can be assessed.	This issue is addressed in the Revision 2 version of the Outline Written Scheme of Investigation **[EN010147/APP/7.6.5]** submitted at Deadline 2.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Heritage impacts are consistently concluded by the applicant as being reversible. This is on the basis that the proposal is 'temporary' in nature for a period of 45 years. Discussion and debate on how much weight should be given to this 45-year period should form part of a robust balancing exercise. This should also be considered against the proposed environmental and bio-diversity enhancements which are likely to become permanent features of the landscape. This period would mean that an entire generation will experience the proposed semi-industrial appearance of the landscape as the character which forms the setting of these assets. This	Reversibility is a consideration that is commonly taken into account when planning decision-makers are considering impacts and effects on the environment. For example, paragraph 2.8.352 of the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) which deals with seascape and visual effects arising from offshore wind projects states '*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*'.	Historic Environment

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	would also result in a large proportion of the population not experiencing the reinstatement of the agricultural landscape in the setting of these again in their lifetime.	The assessment of likely impacts and effects resulting from changes within the settings of heritage assets is presented in ES Appendix 7.5: Settings Assessment **[APP-142]**, with further details provided in the Revision 1 version of this document **[EN010147/APP/6.5]** which was submitted at Deadline 2). In this document, the reversibility of effects is noted but does not actually form part of the assessment process, i.e. the assessed magnitude of impact and hence the level of effect do not take account of the reversibility or irreversibility of the impact. The word 'temporary' does not appear in the assessment of likely impacts and effects resulting from changes within the settings of heritage assets presented as ES Appendix 7.5: Settings Assessment **[APP-142]**. In that document the impacts and effects are described as 'long-term'. Within ES Chapter 7: Historic environment **[CR1-003]** the term 'time-limited' is also used. The use of the terms 'temporary' and 'time-limited' should be seen in the context of national planning policy, specifically paragraph 2.10.66 of NPS-EN3 which addresses the project lifetime of solar farm developments and which states '*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*'. The preceding paragraph of NPS-EN3 refers to an upper limit of 40 years as typical (for solar farm developments). Therefore, it is clear that national policy regards impacts arising from time-limited consents for solar farms as 'temporary'. The Applicant agrees that some of the proposed environmental mitigation measures may become permanent features in the landscape, specifically any new hedgerows that are planted as part of the mitigation for likely landscape and visual effects. Any new hedgerows would thus become part of the setting of heritage assets and would also be a 'new' element of the historic landscape. However, the removal and adjustment of field boundaries is a continuous process as landscape change over time. Major changes can occur such as the change from the medieval open-fields to enclosure landscapes such as those seen across most of Oxfordshire, but most change is much more gradual. The insertion of new hedgerows required for the proposed development is unlikely to result in a significant impact on heritage assets or on the overall character of the historic landscape.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	This outline WSI however will need to be based on the results of the archaeological evaluation, which is yet to be completed. It is paramount that the document is approved by Oxfordshire County Council Archaeological Services early in the examination process, following the submission of the evaluation report. The applicant has also submitted a draft requirement for securing archaeological mitigation post consent. In the absence of a report for the archaeological evaluation to inform the assessment of the significance of any archaeological heritage assets, the impact to this significance, including any contribution made by its setting, has not yet been justified as set out in the Overarching National Policy Statement for Energy, EN1 – paragraph 5.9.17.	Evaluation reports setting out the results of the programme of trial trenching are currently being prepared. It is anticipated that these reports will be submitted at Deadline 5.	Historic Environment
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Agricultural Land Use The applicant's mapping of Best and Most Versatile Agricultural Land included in their Agricultural Land Classification and Soil Survey Report [APP-223] indicates significant coverage of BMV across the project area. Approximately 40% (216ha) of the land proposed for solar PV would be sited on Best and Most Versatile (BMV) agricultural land contrary to local policy At least 4ha will be permanently lost through siting of the National Grid substation. A further 5.5ha will be permanently lost to construction of substations and power converter stations. Mitigation / Improvements The removal of development from areas of best and most versatile agricultural land would mitigate the impacts of development on soil resources.	The effects of the Project on ALC and Agricultural Land Use are assessed in Volume 1, Chapter 17 Agricultural Public Rights of Way **[APP-054]** The ALC survey work has shown the area of survey to comprise mainly subgrade 3b land (69%). As Natural England have commented in their written representation, the solar panels could be removed in the future with no permanent loss and the Applicant has committed to the implementation of a soil management plan (Requirement 11 of the Draft DCO **[APP-233]**) to ensure that soil resources are conserved. The Project would therefore lead to the permanent loss of only approximately 5.5 ha of best and most versatile land, which would not comprise a significant loss of this resource.	Agricultural Land Use
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.13.7 The applicant's mapping of Best and Most Versatile Agricultural Land included in their Agricultural Land Classification and Soil Survey Report **[APP-223]** indicates significant coverage of BMV across the project area. 7.13.8 Approximately 40% (505ha) of the land project area is comprised of Best and Most Versatile (BMV) agricultural land. At least 4ha of this will be permanently lost through siting of the National Grid substation along with 5.5ha permanently lost due to the construction of substations and power converter stations **[APP-054]**. It is also important to highlight the cumulative impacts of solar development on BMV agricultural land in Oxfordshire, as numerous smaller solar proposals are also currently under the consideration of the district councils. Cumulative impact of the project along with other developments could result in significant loss of BMV agricultural land, exceeding 20 Ha. 7.13.9 Local data for crop yields14 indicates steadily increasing trends for wheat yields since	The effects of the Project on ALC and Agricultural Land Use are assessed in Volume 1, Chapter 17 Agricultural Public Rights of Way **[APP-054]** The ALC survey work has shown the area of survey to comprise mainly subgrade 3b land (69%). The economic effects of the change in agricultural land use within the site are assessed in Volume 1, Chapter 15: Socio-economics **[APP-052]**. As Natural England have commented in their written representation, the solar panels could be removed in the future with no permanent loss and the Applicant has committed to the implementation of a soil management plan (Requirement 11 of the Draft DCO(APP-233)) to ensure that soil resources are conserved.	Agricultural Land Use

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	2005 with an average of approximately 8 tonnes / Ha for land within the project area. Wheat production is crucial to the UK's food security with wheat flour providing 20% of the energy and protein consumed in the UK15, as well as the national economy, with value of wheat production measured at £2.91bn in 2023. Agriculture contributed £840m in turnover to Oxfordshire's food economy in 2022.	The Project would therefore lead to the permanent loss of only approximately 5.5 ha of best and most versatile land, which would not comprise a significant loss of this resource. In regard to cumulative developments, these are also assessed in Chapter 17. In the same way as for this project, other solar developments would also be able to be installed and removed with no permanent loss of agricultural land quality, provided appropriate soil management measures are implemented.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO 7.13.10 The applicant considers agricultural use will continue in the form of conservation grazing, primarily by sheep and some small-scale horticultural production areas for use by community food growing groups (**[APP-043]** paragraph 6.1.4) – this is not considered a viable replacement for loss of arable by the OHA to mitigate the loss of BMV.	Volume 1, Chapter 17, Agricultural Land Use and Public Rights of Way (APP-054) at section 17.6.2, explains the capability that Blenheim Estates have in conservation grazing that can be applied within the Site. 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> The detail of the management to be applied within the Site would be implemented in accordance with the principles provided in the outline Landscape and Ecological Management Plan **[APP-235]** as secured by Requirement 6 of the draft DCO. There is no reason why, in the absence of the Project that Blenheim Estates and the other farm holdings that have land within the project site should not reconsider the type of agricultural land that these farmers choose to implement across those areas. The agricultural land use of land is not fixed and is subject to individual landowner decisions that may change over time.	Agricultural Land Use
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.13.11 It questioned why the location of panels has been amended to omit areas of archaeological interest and to allow for sky lark plots but not to preserve areas found to be of the higher quality agricultural grades. This has not been addressed in the Planning Statement and there would appear to be justification for removing panels from certain parts of the site which are of Grade 2 and 3a quality. 7.13.12 Within Cherwell the area to the north-west of The Priory in Begbroke and the field to the south of London Oxford Airport (east of A44) should be considered for removal. 7.13.13 There are also notable areas of Grade 2 agricultural land within West Oxfordshire District to the south and east of Church Hanborough and to the north and north-west of Cassington which should also be removed from the area 7.13.14 For VWHDC, all proposed development should be removed from its BMV land.	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 Practice and Soils Management Plan **[APP-233]**. Sky lark plots had to be free from development as the birds need clean lines of sight to avoid predation. The Lead Archaeologist at Oxfordshire County Council County archaeology officer and the Applicant reached agreement on the best way of protecting significant buried archaeological remains underground archaeology by leaving those areas free of development	Agricultural Land Use
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.13.15 Whilst it is acknowledged that the lifespan of this project is currently expected to be limited to 42 years, this is not considered to be 'temporary' as it will affect the land for at least a generation. This view is supported by the Little Heath Lane appeal decision (ref: APP/A1910/W/23/3317818)	The assessment section 17.9. 15 to 17.9.18 of Volume 1, Chapter 17: Agricultural Land Use and PRoW **[APP-054]** provides recent DCO decisions where the Secretary of State concludes the effects on BMV to be temporary and reversible. As Natural England have also commented in their written representation, the solar panels could be removed in the future with no permanent loss and the Applicant has committed to the implementation of a soil management plan (Requirement 11 of the Draft DCO **[APP-233]**) to ensure that soil resources are conserved. The status of the Project as being 'temporary' is supported clearly in the National Policy, which is applicable to Botley West as an NSIP. See the following paragraphs of NPS EN-3: *2.10.65 Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.* *2.10.66 Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.* The Project is has a proposed operational period of 37.5 years which therefore aligns with the NPS 'typical' upper limit, noting that other solar DCOs have been granted with 60-year operational periods being classified as temporary (see Gate Burton for example). Further, Requirement 14 of the draft DCO secures that decommissioning must commence within 37.5 years following the date of final commissioning (i.e. a maximum operational period of 37.5 years). This means that the nature of the consent is time limited and therefore temporary in accordance with the policy.	Agricultural Land Use
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Noise and Vibration	Rightly, the main focus of this assessment is to determine the potential noise and vibration impact of the development on residential receptors. However, a review has been undertaken of the PROW in the area and it has identified only a small number which will cross the Site. It	Noise and Vibration Impact

Name	Comment	Applicant's Response	Issues
	7.9.8 WODC have previously highlighted concerns regarding the noise impacts of the proposal during the operational phase of the development, particularly noise impacts of the Power Converter Stations and Sub Stations. 7.9.9 The applicant has assessed the impacts on noise sensitive receptors in proximity to the proposed development (primarily residential properties neighboring the site). It is not clear whether schools within 1km of the site have been included in the assessment which was raised in OCC's RR [RR-0793]. It also appears that the assessment does not extend to users of the public rights of way network and associated impacts on the tranquility of the countryside. 7.9.12 It is considered that noise impacts of the project will have a detrimental impact on the environmental quality and amenity of the countryside, particularly in proximity to public rights of way, contrary to Local Policy. 7.9.15 The assessment of noise impact to date has only taken account of noise-sensitive properties (NSP's) i.e. residential and other buildings. This reflects the approach in the British Standard (BS 4142). 7.9.16 It is advisable that an appropriate assessment should also be made for noise impacts to public rights of way. 7.9.20 The OHA consider that many noise and vibration effects can be mitigated through various embedded mitigation measures proposed in the Outline Code of Construction Practice [APP-232 / APP-233] and Outline Operational Management Plan [APP-234] documents supporting the DCO.	is possible that noise from the PCS units will be slightly audible in some areas of some PROW which cross the Site. However, it is not uncommon for industrial noise to be audible on PROWs, as is experienced alongside the Siemens factory in Whitney. Furthermore, receptors on PROW are transient, and so any potential impact experienced by noise from the development, whilst on a PROW, would be for a very short period of time, thereby reducing the magnitude of any impact. The noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in 6.3 - ES Chapter 13 - Noise and Vibration **[APP-050]** Our assessment considers the potential noise impact of the development on residential receptors, as is defined in BS4142. This is the primary technical guidance document to assess industrial and commercial sound on residential receptors. The assessment considers the cumulative effect of all 156 PCS units, and the substations on residential receptors. The assessment shows that noise at each receptor (with all equipment operational) would be low. Therefore, noise generating parts of the development are located at sufficient distance from noise sensitive receptors.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.9.7 Noise and vibration will be created during construction and decommissioning and such activities may result in changes to noise during the day and at night. Some specific activities (such as concrete pouring) may require periods of night-time working but it is noted most construction work would occur during normal daytime working hours (specified as 7.00am to 7pm Mondays to Saturdays). Once completed there is the potential for operational noise effects associated with substations. 7.9.8 WODC have previously highlighted concerns regarding the noise impacts of the proposal during the operational phase of the development, particularly noise impacts of the Power Converter Stations and Sub Stations. 7.9.9 The applicant has assessed the impacts on noise sensitive receptors in proximity to the proposed development (primarily residential properties neighbouring the site). It is not clear whether schools within 1km of the site have been included in the assessment which was raised in OCC's RR **[RR-0793]**. It also appears that the assessment does not extend to users of the public rights of way network and associated impacts on the tranquillity of the countryside.	7.9.7 - Noted & agreed 7.9.8 - Noted & agreed 7.9.9 - The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference **[APP-050]**, with additional information provided in ES Volume 2 (Figures) **[APP-104 & 105]**, and ES Volume 3 (Appendices) **[APP-211 to 213]**. The assessment shows that sound from the development will not be a significant source of sound. The schools which are located close to the Site boundary have been identified as; • The Marlborough Church of England School • Bladon C of E Primary School • LVS Oxford - Special Education School in Oxfordshire • William Fletcher Primary School • St Peter's C.E. Primary School • Eynsham Primary School These schools are located either away from the Site boundary (e.g. William Fletcher Primary School) or at a greater distance from the Site boundary than other nearby noise sensitive receptors. The assessment identifies that the development avoids significant adverse effects from noise or vibration, and so the impact at the school will be either equal to or less than this potential noise impact. Rightly, the main focus of this assessment is to determine the potential noise and vibration impact of the development on residential receptors. However, a review has been undertaken of the PROW in the area and it has identified only a small number which will cross the Site. It is possible that noise from the PCS units will be slightly audible in some areas of some PROW which cross the Site. However, it is not uncommon for industrial noise to be audible on PROWs, as is experienced alongside the Siemens factory in Whitney. Furthermore, receptors on PROW are transient, and so any potential impact experienced by noise from the development, whilst on a PROW, would be for a very short period of time, thereby reducing the magnitude of any impact.	Noise and Vibration Impact
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.9.10 The modelled noise emissions level for Power Converter Station (PCS) units is up to 92 dB(A) **[APP-213]** There are 156 such units proposed across the project area. The applicant's baseline assessment of background noise, from both short term and longterm monitoring positions indicates sound levels well below this with maximum daytime noise level of 69 dB at LT6, adjacent to Lower Road within the Central Site. The background noise at this monitoring position is dominated by road traffic. 7.9.11 The applicant's solar design parameters have previously indicated a noise impact of 67 dB at 10m distance from each PCS. A rough calculation, based on the development of 156 PCS units across the site equates to an area of 5ha, where the noise impacts would exceed the monitored baseline position adjacent to a main highway. 7.9.12 It is considered that noise impacts of the project will have a detrimental impact on the	7.9.10 - The noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in 6.3 - ES Chapter 13 - Noise and Vibration **[APP-050]** Our assessment considers the potential noise impact of the development on residential receptors, as is defined in BS4142. This is the primary technical guidance document to assess industrial and commercial sound on residential receptors. The assessment considers the cumulative effect of all 156 PCS units and the substations, on residential receptors. The assessment shows that noise at each receptor (with all equipment operational) would be low.	Noise and Vibration Impact

Name	Comment	Applicant's Response	Issues
	environmental quality and amenity of the countryside, particularly in proximity to public rights of way, contrary to Local Policy.	WODC make a number of points about the quantity of PCS units, and the sound level at 10m distance. However, the PCS units are distributed across the whole site, and no PCS unit is located within 10m of any receptors. 7.9.11 - There is no requirement to consider the effect of industrial/commercial sound close to main roads. 7.9.12 - Rightly, the main focus of this assessment is to determine the potential noise and vibration impact of the development on residential receptors. However, a review has been undertaken of the PROW in the area and it has identified only a small number which will cross the Site. It is possible that noise from the PCS units will be slightly audible in some areas of some PROW which cross the Site. However, it is not uncommon for industrial noise to be audible on PROW, as is experienced alongside the Siemens factory in Whitney. Furthermore, receptors on PROW are transient, and so any potential impact experienced by noise from the development, whilst on a PROWs, would be for a very short period of time, thereby reducing the magnitude of any impact.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO 7.9.13 Chapter 13 of the ES **[PDB-010]** considers noise and vibration during construction and operation on residential property. It is considered the ES contains adequate information for the ExA to assess the impact of the proposal on noise and vibration.	7.9.13 - Noted & Agreed	Noise and Vibration Impact
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Hours of Operation during Construction Phase 7.9.14 Whilst it is noted that core working hours of 07:00H-19:00H Mon-Sat are proposed in the Outline Code of Construction Practice Part 1 **[APP-232]** it is recommended that construction hours are limited to the following: 07.30H-18.00H Monday to Friday, 07.30H-12.30H on Saturdays and no time on Sundays, Bank and Public Holidays as per CDC's S42 response to the applicant on 08 February 2024.	The working hours for the construction of the Solar Farm, have been calculated based on 7am-7pm, Monday to Saturday 52 weeks of the year, this is required to minimise the overall Construction programme period. This will be used bring in people and materials to the four construction compounds, and access sites, in a safe phased manner. This helps manage traffic flow, logistics and welfare for the operatives arriving, working on the site and departing.	Noise and Vibration Impact
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Noise Sensitive Receptors 7.9.15 The assessment of noise impact to date has only taken account of noise-sensitive properties (NSP's) i.e. residential and other buildings. This reflects the approach in the British Standard (BS 4142). 7.9.16 It is advisable that an appropriate assessment should also be made for noise impacts to public rights of way, given: • regular use of those rights of way by residents of NSP's in the vicinity of their dwellings as well as use of public rights of way by the public, this can include horses and riders on bridleways • PROW are located in many cases in areas of tranquillity • the duration of the development	7.9.15 - Noted & Agreed 7.9.16 - Rightly, the main focus of this assessment is to determine the potential noise and vibration impact of the development on residential receptors. However, a review has been undertaken of the PROW in the area and it has identified only a small number which will cross the Site. It is possible that noise from the PCS units will be slightly audible in some areas of some PROW which cross the Site. However, it is not uncommon for industrial noise to be audible on PROW, as is experienced alongside the Siemens factory in Whitney. Furthermore, receptors on PROW are transient, and so any potential impact experienced by noise from the development, whilst on a PROWs, would be for a very short period of time, thereby reducing the magnitude of any impact.	Noise and Vibration Impact
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.9.17 On a relevant technical note, it can be noted that, within the assessment matrix for Noise Impact **[APP-050]** (ES, Table 13.18, p.39), even with 'low' or 'negligible' ratings for 'sensitivity of receptor', the magnitude of impact can be rated as 'Minor' - the explanation of this term being: "These beneficial or adverse effects are generally, but not exclusively, raised as local factors. They are unlikely to be critical in the decision-making process but are important in enhancing the subsequent design of the project."	7.9.17 - Noted & Agreed	Noise and Vibration Impact
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Background Noise Assessment 7.9.18 A key element of assessments made under BS 4142 is the figure for 'representative background noise' at a receptor, which is compared with the rating level for a new sound source. This provides an assessment of impact, subject to an assessment of context, which informs necessary measures of noise control. 7.9.19 Within the ES, WODC wish to review the derivation of the representative background levels. This will involve access to the raw data of all measured background levels for each assessed location. Such information would routinely be included in an acoustic report and in this case, there will be a high volume of data involved. 7.9.20 The OHA consider that many noise and vibration effects can be mitigated through various embedded mitigation measures proposed in the Outline Code of Construction Practice **[APP-232 / APP-233]** and Outline Operational Management Plan **[APP-234]** documents supporting the DCO. 7.9.21 The DCO (Sch2 Req12) also requires an operational management plan to be submitted to and approved by relevant planning authorities before work on the solar farm commences. Provided a satisfactory plan is submitted, the OHA consider the impact of noise and vibration on residents can be addressed.	7.9.18 - Noted & Agreed. 7.9.19 - Noted & Agreed. This information will be compiled and issued to WODC. 7.9.20 - Noted & Agreed. 7.9.21 - Noted & Agreed. An Outline Operational Management Plan has been provided in **[APP-234]**.	Noise and Vibration Impact

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Traffic and Transport (including Public Rights of Way Highway Network • The permanent impacts of the proposed development on the highway network are likely to be neutral. However, the construction phase is likely to have localised impacts due to the laying of cables under the carriageway and could see an increase in traffic on key routes and junctions. OCC as the Highways Authority requires clarity over the applicant's proposed methodology for routing their cable beneath the A40 • The applicant's proposed highways powers, as set out in the draft DCO **[AS-009]** are too wide-ranging and amendments are needed in this respect and other areas as detailed in this chapter. Public Rights of Way • The proposal does not adequately consider the impacts of the development on users of the PRoW network. Whilst some PRoW improvements have been proposed, these are limited and do not go far enough to mitigate the impact of the development. PRoW mitigation measures and improvements to the scheme suggested by OCC in February 2024 have not been carried forward. The application in its current form cannot be supported from a PRoW perspective and the impact on PRoW is considered to be negative. Mitigation / Improvements • Suggested mitigation in the form of onsite PRoW improvements, a financial contribution to offsite PRoW improvements, delivery of active travel connections, and a permanent reduction in speed limit on the B4017 are detailed in this chapter.	The Applicant notes this helpful summary and provides a response to these within the detailed comments and responses below.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Highway Network 7.8.26 The permanent impacts of the proposed development on the highway network are likely to be neutral. However, the construction phase is likely to have localised impacts due to the laying of cables under the carriageway and could see an increase in traffic on key routes and junctions. Localised impacts can also be expected at the decommissioning stage and at the point of any phased replacement of panels as their efficiency depletes (c. 25 years). 7.8.27 Impacts will need to be mitigated via the Construction Traffic Management Plan(CTMP) which will specify the routes and times that construction vehicles related to the development are permitted to use.	An assessment of the impact of construction traffic upon traffic and transport receptors due to the laying of cables under the carriageway and increases in traffic on key routes and junctions is set out in section 12.10 of ES Volume 1, Chapter 12 **[APP-049]**, which has been prepared in accordance with industry standard guidance and good practice and aligns with the approach adopted for similar infrastructure projects. It assesses the impact of construction traffic upon driver delay (congestion, including the impact upon driver delay from installing cables within roads and from increases in traffic on key routes and junctions), non-motorised user delay, non-motorised user amenity, severance, public transport delay, road safety and the impact of Abnormal Indivisible Loads on the safety of users of the road network. It concludes that the construction traffic would not create any significant effects upon traffic and transport receptors. An access strategy that specifies construction vehicle routes is set out in section 12.7 of ES Volume 1, Chapter 12 **[APP-049]** and Appendix 12.6 Construction Vehicle Trip Generation Assumptions **[APP-204]**. The access strategy and its construction vehicle routes and timings is contained 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 Development Consent Order **[APP-015]**. An Outline Decommissioning Plan **[APP-236]** has been submitted in support of the application for development consent from which a Decommissioning Plan will be prepared as secured in Requirement 14 of the Development Consent Order **[APP-015]**.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.27 A similar requirement for a CTMP needs to be included in the Outline Decommissioning Plan **[APP-236]** to cover the traffic impact of this phase. Likewise, submission of a CTMP should be included in the Outline Operational Management Plan **[APP-234]** to cover the transport impact of any phased replacement of panels or other significant maintenance works.	Section 1.2 of the Outline Decommissioning Plan **[APP-236]** sets out that a Decommissioning Traffic Management Plan (DTMP) will be produced and approved for the Project following the appointment of a contractor, prior to the commencement of the decommissioning phase of the Project. This is secured in Requirement 14 of the Development Consent Order **[APP-015]**. 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. 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. 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.	Traffic Transport and Access

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.28 The OHA believe this revision to the outline documents is required at this stage as the wording of sub paragraph (2) of requirement 12 (Operational Management Plan), and sub paragraph (4) of requirement 14 (Decommissioning and Restoration) **[APP-015]**outlines that both the Operational Management Plan and Decommissioning Plan to be submitted to OHA for approval must be substantially in accordance with the outline documents.	The Applicant notes Oxfordshire County Council's comment and confirms it is in ongoing dialogue with Oxfordshire County Council and will discuss the Outline Decommissioning Plan **[APP-236]** and the Outline Operational Management Plan **[APP-234]** together with progressing a Statement of Common Ground.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.29 OCC as the Highways Authority is currently implementing a series of works to improve the A40. This includes the roundabout where the B4449 meets the A40 which is where the applicant's cable route proposes to cross the A40. It is likely that OCC will seek to implement a notice under Section 58 of the New Roads and Street Works Act (1991) in order to restrict the execution of street works once the improvements to the A40 have been completed. 7.8.30 No detailed methodology has been put forward by the applicant to indicate how they intend to lay their cable across the site, including the A40. Given the likelihood of a S.58 notice OCC would not support a methodology which would involve excavation of the improved section of the A40. 7.8.31 OCC may be able to support Horizontal Directional Drilling being used to run the cable beneath the improved A40 works. However, OCC would need to agree the details and methodology of the proposed HDD in advance of the applicant commencing works. 7.8.32 OCC therefore seeks further clarity from the applicant with regards to the methodology the applicant intends to employ to route their cable across the site, in particular with respect to the A40. OCC would also welcome direct engagement with the applicant to attempt to overcome this issue.	The Applicant notes Oxfordshire County Council's comment and confirms it is in ongoing dialogue with Oxfordshire County Council and will discuss the laying of cables across the A40 direct together with progressing a Statement of Common Ground.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.33 OCC would also welcome discussions on the Applicant's proposed highways powers, as set out in the draft DCO **[AS-009]** which, in their current form, are too wide-ranging.	The Applicant notes Oxfordshire County Council's comment and confirms it is in ongoing dialogue with Oxfordshire County Council in this regard and in progressing a Statement of Common Ground accordingly.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.34 Proposed alterations to the highway will need to consider all users in line with LTCP policy 1 – Transport User Hierarchy and 15 – Vison Zero to ensure the most vulnerable road users are prioritised. This would include such proposals highlighted in paragraph 12.7.18 – B4044 Eynsham Road/B4017 Cumnor Road and paragraph 12.7.18 – Widening works on Cumnor Road, B4027 / Banbury Road, Burleigh Road /Yarnton Road junction of the ES **[APP-049]**.	The proposals at the B4044 Eynsham Road/B4017 Cumnor Road junction, along Cumnor Road, at the B4027 / Banbury Road junction and at the Burleigh Road /Yarnton Road junction as set out in paragraph 12.7.18 of ES Volume 1, Chapter 12 **[APP-049]** and at Appendix 12.8 Accesses and highway drawings Part 4 of 4 **[APP-209]** have taken account of LTCP policy 1 – Transport User Hierarchy and policy 15 – Vison Zero to ensure the most vulnerable road users are prioritised. Pedestrian facilities at these locations are unaffected whilst there would be improvement to the turning and safe movement of vehicles thus offering highway safety improvements to all road users including cyclists and the transport user hierarchy set out in the LTCP. Similarly, the access designs set out in Appendix 12.8 Accesses and highway drawings Parts 1 to 4 **[APP-206 to APP-209]** and Site Construction Compound Accesses **[APP-226]** have been prepared in accordance with highway design standards and take due regard to non-motorised user provisions and movement in accordance with the transport user hierarchy set out in the LTCP. All HGV and Abnormal Indivisible Load (AIL) movements will be in accordance with the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and is secured at Schedule 13 of the Development Consent Order **[APP-015]**. Paragraph 1.1.8 of the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** sets out that the purpose of the OCTMP is to set out how the numbers and routeing of HGVs will be managed during the construction phase and sets out the details of measures to manage the safe passage of HGV (and AIL) traffic via the local highway network, details of localised road improvements if and where these may be necessary and measures and processes relating to AILs to facilitate safe use of the existing local highway network. Thus, the movements of HGVs and AILs align with LTCP policy 15 to support OCC's Vision Zero Action Plan which states an ambition to have zero road fatalities or serious injuries on Oxfordshire's transport system by 2050. With the measures set out within the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]**, risks of conflict between HGVs and AILs and vulnerable road users would be mitigated to support LTCP policy 1, 2 and 15. The movement of construction staff is controlled at Section 1.5 of the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and is secured at Schedule 13 of the Development Consent Order **[APP-015]**. This sets out that the Principal Contractor will be responsible for providing a minibus service to pick up / drop off all construction staff to / from identified locations such as park and ride sites, public transport hubs etc. Thus, the movement of construction staff will be controlled such that it restricts movements on rural roads to reduce the possibility of rat running and also directly addresses OCC's travel behaviour ambition stated in their LTCP to replace/remove 1 in 4 car trips by 2030.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.35 Additional highway alterations required as part of the development should align with LTCP Transport User Hierarchy and support policy 1 and policy 15 of LTCP. 7.8.36 All HGV and AIL movements should align with LTCP policy 15 to support OCC's Vision Zero Action Plan7 which states an ambition to have zero road fatalities or serious injuries on Oxfordshire's transport system by 2050.		Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.37 Paragraphs 12.7.13 – 12.7.16 of **[APP-049]** concern the origin of construction staff movements. Measures to restrict movements on rural roads to reduce the possibility of rat running must be included in the Construction Traffic Management Plan to be submitted as part of the Code of Construction Practice. A bullet point should be added to paragraph 1.5.2 of the Outline Construction Traffic Management Plan (Annex A of the Outline Code of Construction Practice **[APP-232]** to address this.		Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.38 PROW throughout the site should be protected, maintained or mitigations sought in line with LTCP policy 5		Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.39 Paragraph 2.10.143 of NPS EN-3 states that applicants should liaise with the local highway authority regarding the start of construction and broad timings of deliveries. We support this in line with LTCP policy 1, 15 and 47 to ensure conflicts between transport users is minimised. Paragraph 2.10.143 of NPS EN-3 also states that Applicants may need to agree a planning obligation to secure appropriate measures, including restoration of roads and verges		Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.40 Table 12.6 (issues considered within this assessment; page 31 of **[APP-049]**) – mitigation must be agreed to ensure the impact on walking, cycling, wheeling and public transport routes is minimised during construction phases. Any changes in travel behaviour may adversely affect OCC's ambition stated in LTCP to replace/remove 1 in 4 car trips and increase the number of cycle trips in Oxfordshire from 600,000 to 1 million by 2030. 7.8.41 Any risk of conflict between HGVs and AILs and vulnerable road users should be mitigated to support LTCP policy 1, 2 and 15.		Traffic Transport and Access

Name	Comment	Applicant's Response	Issues
		In accordance with Paragraph 2.10.143 of NPS EN-3, OCC, as the Local Highway Authority will be consulted to progress and finalise the detailed CTMP(s), as required by the OCTMP which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and is secured at Schedule 13 of the Development Consent Order **[APP-015]**. Thus, OCC, as the Local Highway Authority will be consulted regarding the start of construction and timings of deliveries and in accordance with LTCP policy 1, 15 and 47 to ensure conflicts between transport users is minimised. Section 1.10 of the OCTMP **[APP-232]** sets out a requirement for highway condition surveys to be undertaken to identify any damage that may have occurred to any local roads as a result of construction vehicles and for a remediation strategy to be prepared to remedy any such damage. This includes verges. The OCTMP and the highway condition surveys contained therein is secured at Schedule 13 of the Development Consent Order **[APP-015]**. Mitigation relating to Table 12.6 of ES Chapter 12 **[APP-049]** is set out in the OCTMP **[APP-232]** 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]**. OCC will be consulted to progress and finalise the detailed CTMP(s), as required by the OCTMP **[APP-232]**, and will allow all mitigation to be agreed to ensure the impact on walking, cycling, wheeling and public transport routes is minimised during construction phases. The Outline Public Rights of Way Management Plan, attached to the Outline Code of Construction Practice Part 1 **[APP-232]** sets out outline measures for the management, protection, maintenance and mitigation for Public Rights of Way during the construction phase **[APP-232]** and is secured by requirement 11 of the draft DCO. Paragraph 1.1.9 of the document explains that a full and detailed Public Rights of Way Management Strategy will be developed in general accordance with this Outline Public Rights of Way Management Plan and submitted post consent; this will ensure that Public Rights of Way throughout the site would be protected, maintained and mitigated in line with OCCs LTCP policy 5.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Public Rights of Way (PRoW) 7.8.42 OCC manages the legal record and access functions on the PRoW and access land network. In addition to the statutory functions of recording, protecting and maintaining PRoW, the authority's role includes securing mitigation measures from residential and commercial developments that will have an impact on the PRoW and access land network in order to make those developments acceptable. This work meets the aims and outcomes of the adopted Oxfordshire Rights of Way Management Plan 2015-2025. 7.8.43 The project area contains a network of PRoW which cross the site and link neighbouring settlements with the surrounding countryside. PRoW provide a recreation resource for communities, support tourism in the locality as a means for visitors to appreciate the Oxfordshire countryside, and support the health and wellbeing of communities by encouraging active lives and access to nature. 7.8.44 The scale and location of this development and the impact on: local land use; landscape attractiveness; the countryside 'feel' of the area; and on access and amenity for local residents and PRoW users, is significant and unprecedented. The impacts will be felt during construction as well as in the operational period. By enclosing many PRoW with fencing and hedging and constructing large fields of solar panels and supporting large infrastructure, it needs to be understood that the feel of the local environment from the paths, and the quality of the paths themselves, will be significantly affected. 7.8.45 This is at odds with paragraph 2.10.43 of the NPS EN-3 which outlines that 'Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.' 7.8.46 Excessively narrow paths enclosed by hedges or fences will have restricted views and are likely to suffer from the effects of shadowing, loss of sun and wind drying and adverse changes to the surface (paths are more likely to suffer from poaching and wear as a used line develops). Hedge species choice can adversely affect users with excessive side and top growth potentially obstructing the path and limiting the width available. Thorny and 'spiky' vegetation can be injurious to path users from arisings left after cutting back. 7.8.47 Through appropriate mitigation and amendments to the design, the development needs to ensure that, both onsite and offsite, people still feel a connection to the countryside and can enjoy a countryside experience when using PRoW for active travel, leisure and recreational journeys. 7.8.48 The OHA's view on this issue is supported by NPS EN-3 Paragraph 2.10.44. 7.8.49 A comprehensive package of measures is required to minimise negative impacts and to mitigate the changes in the local landscape and environment before construction	The impacts of the Project will be minimised by a comprehensive designed-in landscape mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]**, Landscape, Ecology and Amenities Plan **[APP-228]** and Outline Landscape and Ecology Management Plan **[APP-235]**. 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 proposed planting 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. Wider green corridors are also characteristic of the existing landscape, e.g., much of Dornford Lane (PRoW 416/11/30) which passes through the middle of the northern section of the Project. It is intended that the proposed landscape 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, at the same time improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW corridors, views of the wider landscape and key features such as church spires would remain open and available to visual receptors. The retention of proposed designed-in landscape mitigation 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 and proposed landscape mitigation takes account of and reinforces: • *retain mature boundary and roadside trees and replant as necessary;* • *manage and extend existing areas of woodland to maximise their wildlife and landscape value;*	Traffic Transport and Access

Name	Comment	Applicant's Response	Issues
	commences, during construction and operation, and in the decommissioning and reversion phases when the additional public access provision must not be lost.	• *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, much of it within the Blenheim Estate, in areas close to the Project. Areas of these new woodlands 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. The points in relation to public health and PRoW have been responded to in the Applicant Responses to Relevant Representations **[REP-020]** responses on Human Health (pdf pages 72 to 96 of 545). Protecting and promoting use of the PRoW network has been a strong theme of the health assessment and the development of mitigation. In particular see the response to sub-issue "Access to open space, public rights of way, recreation, and physical activity" on pdf page 74 of 545 **[REP-020]**. Furthermore, with regard to the feel of the PRoWs, Appendix 1 of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) **[REP1-019]** discusses how regard has been given to the experience of change for those with highted sensitives associated with neurodiversity. This includes development of the greenways (with width, hedges, trees and trail/signage) that promote the quality of the physical activity opportunity	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.50 Given the development's role as nationally significant infrastructure, it is vital that a sustainable and inclusive approach to PRoW is taken. The mitigation measures need to be incorporated into specific actions on the ground, agreed with the OHAs and become part of the development proposal.	The Applicant notes this comment and is continuing to engage with the relevant stakeholders regarding the management of PRoW and Active Travel within the Project.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.51 As advised in OCC's PEIR response (8th February 2024) and in OCC's Relevant Representation (27th February 2025) **[RR-0793]**, the following mitigation measures are required in respect of all PRoW affected by the application: - All PRoW across the sites that pass through/adjacent to solar fields need to be provided as landscaped 'greenway' PRoW – with a minimum 15m overall 'corridor' width (additional width to be dedicated), access for small PRoW maintenance vehicles, planted with an appropriate non-injurious/thorny hedge, shrub & tree planting palette. The reason for this provision is so the visual impact and proximity of fencing and built infrastructure is softened whilst still providing wide, clear and accessible paths for people. - All fenced-in PRoW need to be stone surfaced to 3m width with 3-4m clear grass verges each side of this, with graded landscaped edges between the path and the fencing. The full width of the PRoW needs to be dedicated as PRoW to ensure permanent protection. - Selected PRoW on each of the sites need connecting up within the site to provide a high qualify, coherent and connected network with high quality path provision, good signing and accessible infrastructure (gates, seating, water crossings etc). We would welcome discussion with the developer on this . - The development should provide a range of bridleway PRoW to provide alternative routes for horseriders, as well as walkers and cyclists, to reduce the need to use roads and to increase user safety. These should be provided onsite by the developer, provided within the landownership/control boundary (blue line boundary) by the developer/landowner. Other offsite mitigation should take the form of a financial contribution for offsite mitigation undertaken by the Countryside Access Strategy Team at OCC. This team negotiates and agrees this kind of project with third-party landowners and farmers and undertakes project delivery through private contractors. The scale of this contribution will depend on what onsite/in-control mitigation is agreed. - PRoW crossed by underground HV and other cables, ditches and ducts etc need to be disturbed as little as possible, if at all. Pipes and cables should be horizontally dug/bored so that the PRoW isn't disturbed. Where this isn't possible, disturbance must be kept to a minimum and the safety of users maximised. This could be achieved by excavating each side of the PRoW and only excavating the PRoW just prior to duct work or the cable being laid. The ditch must not be left open/exposed and should be filled in,compacted/consolidated and path made good immediately after cables laid, in order to reduce disturbance to the path and user. - Phased and planned temporary closures/diversions of PRoW should only be undertaken when necessary i.e. if works cannot be undertaken with the PRoW open and access made safe by using banksman/fencing etc. Closures should be for a minimal duration to cover the essential works and in all cases an alternative route should be approved by OCC Countryside	The detailed landscape design of the Project will be developed in general accordance with the outline Landscape and Ecology Management Plan [APP-235] secured by Requirement 6 of the draft DCO and the Landscape, Ecology and Amenities Plan [APP- 228] including the arrangements for "greenways". The outline measures for the management of Public Rights of Way during the construction phase [APP-232] secured by requirement 11 of the draft DCO contains outline measures for signage, safety fencing, arrangements for managed crossings, monitoring requirements and reinstatement of routes. Paragraph 1.1.9 of the document explains that a full and detailed PRoW Management Strategy will be developed in general accordance with this Outline PRoW Management Strategy and submitted post consent. The preparation and submission of a final CoCP and PRoW Management Strategy for agreement with the relevant Local Authorities. The details, as required in relation to PRoW are therefore secured through the delivery of the management plans above. The Applicant continues to liaise with relevant stakeholders regarding the management of PRoW and Active Travel within the Project.	Traffic Transport and Access

Name	Comment	Applicant's Response	Issues
	Access and provided in advance, and maintained for the duration, of the temporary closure. - No use of PRoW for development purposes other than if essential as a crossing point between fields. All vehicle crossing points to be monitored when active. Crossing point PRoW must be protected from HGV by weight spreading mats, appropriate stone reinforcement, and making good within 24 hours.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.52 Specific mitigation measures were also supplied to the Applicant in OCC's PEIR response (8th February 2024) and in OCC's Relevant Representation (27th February 2025) **[RR-0793]** with accompanying masterplan maps annotated with lines and codes; these maps are consolidated and reproduced at Appendix 3 of this LIR and should be referred to for the onsite and offsite mitigation measures required to mitigate the development. The measures are not exclusive, and OCC Countryside Access Strategy would welcome the opportunity to survey all areas and paths to further refine requirements.	The Applicant is continuing to engage with OCC regarding the proposals in the relevant representation.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.53 A financial contribution of £350,000 (Baxter indexed from April 2024 with a 10 year longstop) is also considered necessary to secure off-site and out-of-ownership PRoW improvements to mitigate the loss of visual amenity and to provide alternatives or extensions of routes in the locality and impact area up to 3km from the boundary of the sites. 3km is considered reasonable to enable the assessment and improvement of key routes in the local area. Improvements will not be needed for all PRoW within 3km of the site boundary, just those that enable more user choice about whether or not to pass through the altered landscape of the solar farm.	The Applicant is continuing to engage with OCC regarding the proposals, including the approach to off-site ProW improvements, and the necessary contributions to resource those if required.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.8.54 OCC's PEIR response and Relevant Representation **[RR-0783]** emphasised the importance of PRoW to the public and the negative impact that the solar farm will have on PRoW. The Applicant's Consultation Report **[APP-024]** states "the Applicant intends to retain all existing PRoWs throughout the Project area" (page 43). These PRoW will exist in a different context because of the solar farm and the 'countryside feel' that people often seek for leisure and health benefits will be irreversibly changed. 7.8.55 The Consultation Report **[APP-024]** states: that the "Applicant is looking at ways the Project can improve the PRoWs in the area" (page 43), and that the Project is contributing to "securing new recreational routes, including permissive paths, cycleways and Green Ways, to mitigate potential adverse effects on public health associated with changes in the use of the PRoW network" (page 125). Whilst some improvements have been proposed and are welcomed, these are limited and do not go far enough to mitigate the impact of the development on PRoWs. OCC therefore seek further improvements to address this.	The points in relation to public health and PRoW have been responded to in the Applicant Responses to Relevant Representations [REP-020] responses on Human Health (pdf pages 72 to 96 of 545). Protecting and promoting use of the PRoW network has been a strong theme of the health assessment and the development of mitigation. In particular see the response to sub-issue "Access to open space, public rights of way, recreation, and physical activity" on pdf page 74 of 545 **[REP-020]**. The impacts of the Project will be minimised by a comprehensive designed-in landscape mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]**, Landscape, Ecology and Amenities Plan **[APP-228]** and Outline Landscape and Ecology Management Plan **[APP-235]**. 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 proposed planting 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. Wider green corridors are also characteristic of the existing landscape, e.g., much of Dornford Lane (PRoW 416/11/30) which passes through the middle of the northern section of the Project. It is intended that the proposed landscape 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, at the same time improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW corridors, views of the wider landscape and key features such as church spires would remain open and available to visual receptors. The retention of proposed designed-in landscape mitigation 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 and proposed landscape mitigation takes account of and reinforces: • *retain mature boundary and roadside trees and replant as necessary;* • *manage and extend existing areas of woodland to maximise their wildlife and landscape value;*	Traffic Transport and Access

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		• *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, much of it within the Blenheim Estate, in areas close to the Project. Areas of these new woodlands 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. Please also refer to the Applicant's response to REP1-072 **[EN010147/APP/12.4].**	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Active Travel 7.8.56 Many of the PRoWs through the application site form part of strategic walking and cycling connections across Oxfordshire, as identified in Oxfordshire's Strategic Active Travel Network (SATN) and Local Cycling and Walking Infrastructure Plans (LCWIP) (see: OCC Active Travel Strategy10); the development of these is a key priority for OCC and is tied in with the goals of the Local Connectivity and Transport Plan11 which seeks to reduce 1 in 4 car trips by 2030 and deliver a net zero transport network by 2040. 7.8.57 The health benefits of active travel are well known and supported (including in Oxfordshire's Health and wellbeing strategy 2024 – 203012). The delivery of new active travel connections as part of the proposed development would support healthier choices and is required to mitigate the negative impacts of the proposal.	The Landscape, Ecology and Amenities Plan [APP-228] shows the location of walking and cycling provision as part of the Project. The Applicant is continuing to engage with OCC regarding the provision of Active Travel routes. The points in relation to public health and PRoW have been responded to in the Applicant Responses to Relevant Representations **[REP-020]** responses on Human Health (pdf pages 72 to 96 of 545). Protecting and promoting use of the PRoW network has been a strong theme of the health assessment and the development of mitigation. In particular see the response to sub-issue "Access to open space, public rights of way, recreation, and physical activity" on pdf page 74 of 545 **[REP-020]**.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Wootton to National Cycle Route 5 7.8.58 Whilst OCC welcome the Applicant's proposed walking and cycling route, which is indicated by the blue dotted line on Transport Figure 1 below, we consider it should be surfaced so that it is appropriate for walking, cycling and horse riding (e.g. by using compact gravel) and request that the Applicant confirms that this this will be taken forward. In addition, the Applicant should provide the linking bridleway between 416/20/10 and 416/2/50 as indicated by the black line on Transport Figure 1, also using compact gravel or similar. This will enable safe and continuous connectivity between the public rights of way within the site and ensure the countryside can still be accessed and enjoyed.	The Applicant welcomes OCC's response. The detail of surfacing for the route would be developed as part of the detailed Landscape and Ecological Management Plan (APP-235) prior to construction, in consultation with the relevant local authority. This would be secured via Requirement 6 of the draft DCO.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Bladon to Begbroke walking and cycling route 7.8.59 'A track from Bladon to Begbroke across the site' is proposed and this is welcomed (being also identified in the Woodstock LCWIP and OCC's Strategic Active Travel Network ("SATN")). For the improvements to have strategic benefit OCC require walking and cycling to be permitted. Therefore, a change from footpath to cycle track is sought. Furthermore, the current depiction of this track (indicated by the blue line in Transport Figure 2) – which is labelled a cycle path on plans (but recorded as footpaths 132/2/10 and 265/26/10), does not connect to Bladon or Begbroke. Currently the proposed cycle path connects to a footpath 124/12/10 before joining the A44, so continuous cycling is not possible along this route. 7.8.60 OCC seek the Applicant to deliver a cycle path through their site from Begbroke to Langford Lane (a key employment and residential gateway). We seek further discussion with the Applicant regarding the opportunities for cycle paths shown by black dashes in Transport Figure 2. These paths should be surfaced with flexipaving or similar.	The Applicant is continuing to engage with OCC regarding the implementation of the proposed cycle routes as part of the Project.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Strategic walking and cycling connections 7.8.61 As outlined in both OCC's PEIR response and Relevant Representation **[RR-0793]**, OCC have two planned strategic walking and cycling improvement schemes that interact with the solar farm. One such scheme is a connection between Eynsham and Hanborough, which forms part of OCC's SATN. OCC are pursuing two routes between Eynsham and Hanborough – a PRoW route that crosses the solar farm site (shorterterm ambition) and a route adjacent to Lower Road (longer-term ambition). 7.8.62 OCC request that the Applicant convert the section of PRoW through their site (known as footpath 238/5/20), circled in red in Transport Figure 3 below, to a bridleway with compacted stone surface to seamlessly connect into other PRoW improvements suggested by OCC. This will contribute to OCC's planned PRoW connection between Eynsham and Hanborough and compensate current and future residents and visitors of the area for the negative impact on the landscape and 'countryside feel' that the solar farm would have.	The Applicant is continuing to engage with OCC regarding this PRoW network through the Project site.	Traffic Transport and Access

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Strategic walking and cycling connections 7.8.63 In addition, OCC request that land along the western and eastern verges of Lower Road be safeguarded for future development of a walking and cycling route. The proposed route between Eynsham and Hanborough via Lower Road links in with the planned B4044 Eynsham to Botley cycle route. Both routes in part overlap with the proposed cable route for the solar farm. 7.8.64 The Applicant has not finalised details of the cable laying, but if trenches are dug along the planned routes, a requirement of the DCO should be to agree details of their reinstatement to ensure compatibility with the future cycle path construction.	A pedestrian and cycle route along Lower Road forms part of the accessibility proposals for the Salt Cross Garden Village proposal (West Oxfordshire District Council planning application reference: 20/01734/OUT; planning application submitted and pending approval). The Project would generate negligible demand for cyclists and that demand would not be to a level that requires a new cycle route to be provided along Lower Road. Notwithstanding, the Project will help facilitate the proposed cycle route by not installing any part of the Project along land within the Order Limits that is outside of the adopted highway boundary adjacent to Lower Road and retaining that land for the future provision of the cycle route. This is set out on the Landscape, Ecology and Amenities Plan **[APP-228]** which shows the future cycle route along Lower Road within the Order Limits. Whilst the Project will not deliver this cycle route, the land required for it is effectively safeguarded by the Project to enable it to be brought forward as part of the Salt Cross Garden Village proposal. A cycle route along the B4044 Eynsham Road has been a community led aspiration that was previously considered but not progressed by Oxfordshire County Council. The Project would generate negligible demand for cyclists and that demand would not be to a level that requires a new cycle route to be provided along the B4044 Eynsham Road. The Order Limits do not include any land outside of the adopted highway boundary along the B4044 Eynsham Road and the Project is not therefore able to dedicate land to help facilitate such a cycle route in this location.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Southern section B4017 speed limit change 7.8.65 The B4017 between Farmoor and Cumnor is indicated as the route of underground cables and the access for a construction compound serving the solar farm. This is a proposed strategic route within Oxfordshire's SATN. Additional heavy goods vehicles on this route caused by the solar farm will pose a road safety risk for people cycling on this road. Accordingly, the Applicant proposes a speed limit change within Part 1 of Schedule 8 to the draft DCO – "B4017 Cumnor Road between a point 83 metres to the south of Farmoor Court and a point 170 metres to the north of Leys Road as shown on sheets 12 and 13 of the traffic regulation measures plans". In the location mentioned above, Part 1 proposes a "temporary change in speed limit to 40 miles per hour". OCC would want this as a permanent change to the speed limit and seek £5,000 (index linked) for the erection of signage to support the speed limit change. If a Traffic Regulation Order variation is required for a permanent change in speed limit, the cost would be £4,224 (RPIX index linked at April 2025 price base).	The Applicant welcomes Oxfordshire County Council's costings relating to the changes to Traffic Regulation Orders and the erection of associated signage. The Applicant will continue discussions with Oxfordshire County Council regarding the most appropriate means of securing these contributions.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO Highway Network 7.8.66 Impacts will need to be mitigated via the Construction Traffic Management Plan (CTMP) which will specify the routes and times that construction vehicles related to the development are permitted to use. 7.8.67 OCC would welcome discussions on the Applicant's proposed highways powers, as set out in the draft DCO which, in their current form, are too wide-ranging. For instance, and to name but three of our concerns, OCC is concerned by (i) the absence of a need for consent before carrying out the street works mentioned in article 8(1) (street works), (ii) the absence of a need for consent before carrying out the works mentioned in article 9(1) (power to alter layout, etc. of streets), and (iii) how OCC will be resourced to carry out additional highways-related work proposed by the draft DCO. Further detail on DCO requirements is set out in section 8.	An Outline Construction Traffic Management Plan (OCTMP) forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and includes measures such as vehicle routeing and timing and is secured at Schedule 13 of the Development Consent Order **[APP-015]**. Paragraph 1.1.8 of the OCTMP states a detailed Construction Traffic Management Plan(s) (CTMP)(s), will be prepared strictly in accordance with this OCTMP and in consultation with Oxfordshire County Council as the Local Highway Authority and National Highways as the highway authority for the strategic road network. The Applicant notes Oxfordshire County Council's comment regarding highway powers and confirms it is in ongoing dialogue with Oxfordshire County Council in this regard and in progressing a Statement of Common Ground accordingly.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO PRoW 7.8.68 The proposal does not adequately consider the impacts of the development on users of the PRoW network. Mitigation requirements have been set out above.	The effects of the Project on the connectivity of the PRoW network are assessed within Volume 1, Chapter 17 – Agricultural Land Use and Public Rights of Way **[APP-054]**. The visual effects of the Project on PRoW are assessed within Volume 1, Chapter 8: Landscape and Visual Impact Assessment **[APP-045]**. The health effects of the Project on PRoW users are assessed within Volume 1, Chapter 16: Human Health **[APP-053]**	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO PRoW 7.8.69 The draft DCO does not contain any provision for improvements to existing PRoW and creations/extensions and status upgrades. As it stands the draft DCO only contains permanent/temporary closures, diversions and replacements, permanent and temporary vehicle use of PRoW and includes a reference to PRoW under management.	The proposed location of additional permissive routes and cycle routes are identified on the Landscape, Ecology and Amenities Plan **[APP-228]**. The Applicant will take away the wider point around improvements improvements to existing PRoW and creations/extensions and status upgrades and re-consider its proposals to ensure that the draft Development Consent Order provides the necessary powers required to deliver those proposals. If any updates are required to the draft DCO, the Applicant will make those at future deadlines.	Traffic Transport and Access

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO PRoW 7.8.70 The OHA question whether the draft DCO can replace the provisions in TCPA 1990 and Highways Act 1980 for changes to PRoW as there is insufficient detail provided in the plans, table or text for an assessment of impact and reasonableness to be made. Specifically for PRoW there needs to be a justification of the need for change, the length and width of the affected PRoW, the length, width, gradient, surfacing and limitations of the proposed alternative PRoW.	The details of the PRoW affected and the proposed management measures during the construction phase of the Project are provided in the outline Public Rights of Way Management Plan **[APP-232]**. Table 1.1 provides the lengths of each PRoW within the Project; Table 1.2 provides the outline measures to be adopted for each PRoW affected and the lengths of any diversion routes that have been identified. The detail of the measures for fencing, surfacing; widths for routes affected would be included within the detailed PRoW management plan to be developed pre-construction to be approved by Oxfordshire County Council in consultation with other relevant stakeholders, secured by Requirement 11 of the DCO and within the detailed Landscape and Ecological Management Plan, secured through Requirement 6 of the draft DCO.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO PRoW 7.8.71 The draft DCO needs to include provision for the effective monitoring, maintenance, repair and restoration of the affected PRoW during construction and operational phases and the involvement of the highway authority. This is included under part 3 'Streets' for public roads but it is not clear about its application to public rights of way.	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.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO PRoW 7.8.72 It is unclear clear why public rights of way are ordered by district council area when the surveying and managing authority is OCC.	The Applicant understands that the PRoW are in the managing authority of OCC. The definitive PRoW numbering is at a District Level, hence the identification of the routes on that basis.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO PRoW 7.8.73 OCC would like to see closures reduced to the bare minimum and continuity/certainty of access as much as possible, and effective management and maintenance of the diverted routes. 7.8.74 Noting the powers contained in article 11(1)(b) (Temporary closure of public rights of way), OCC consider the draft DCO should not authorise any use of vehicles on PRoW which remain open without first undertaking an assessment of impact and putting in a prevention, repair, maintenance and monitoring scheme for each proposed route, to be approved by the highway authority (Oxfordshire County Council).	The outline Public Rights of Way Management Plan (APP-232) contains outline measures for the management of PRoW during the construction process, secured through Requirement 11 of the draft DCO. This outline plan will be developed into a detailed PRoW management plan pre-construction for discussion with relevant stakeholders and approval by OCC and would include measures for monitoring and repair to routes, as required for individual routes.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Adequacy of the application/DCO PRoW 7.8.75 In addition, it would be helpful if the Applicant could explain why article 11(4) refers to "street authority" and not "highway authority". The same point applies to article 12(2) (permanent closure of public rights of way).	"Street authority" has been defined in relation to Part 3 of the New Roads and Street Works Act 1991, which states that "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. In most cases, the public rights of way will be maintainable and therefore the highways authority is the relevant authority but this definition allows for the article to apply to relevant PRoW where these are privately maintained.	Traffic Transport and Access
Joint Local Impact Report of CDC, VWHD, WODC and OCC	1. Recitals The fourth recital refers to "section 104(2)(f) of the [Planning Act 2008]"; however, there is no such provision. The sub-paragraphs in section 104(2) run from (a) to (d)). The OHA assume the reference should be to "section 104(2)" because the SoS will have had regard to all the documents referred to in sub-paragraphs (a) to (d) and not just one of them).	The Applicant agrees that the intention is for the Secretary of State to consider section 104(2). The inclusion of '(f)' is reference to footnote (f).	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	2. Art.2(1) (interpretation) The definition of "electronic transmission" refers to "electronic communications network", which is not defined in art.2(1). It is, however, defined in the definition of "electronic transmission" in several DCOs as follows – "… and in this definition "electronic communications network" has the same meaning as in section 32(1) (meaning of electronic communications networks and services) of the Communications Act 2003". The precedents are legion and here are just 5: A12 Chelmsford to A120 Widening Development Consent Order 2024; Boston Alternative Energy Facility Order 2023; HyNet Carbon Dioxide Pipeline Order 2024; Portishead Branch Line (MetroWest Phase 1) Order 2022; and A428 Black Cat to Caxton Gibbet Development Consent Order 2022.	The Applicant does not consider it necessary for "electronic communications network" to be defined further for the purposes of the draft DCO, consistent with other Solar DCOs such as East Yorkshire Solar Farm, Cottam Solar Project, and West Burton Solar Project.	DCO Process

Name	Comment	Applicant's Response	Issues
	The OHA would be grateful if the Applicant could consider whether the definition of "electronic communications network" should form part of the definition of "electronic transmission".		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	3. Art.2(1) (interpretation) The "permitted preliminary works" are excluded from the definition of "commence". Several of the excluded works seem significant; for instance, sub-paragraph (c) includes "works in relation to construction compounds and access to construction compounds" and sub-paragraph (h) includes "site clearance (including vegetation removal, demolition of existing buildings or structures". The OHA would welcome more information in respect of these, including (in respect of sub-paragraph (h) for example) which existing buildings and structures are proposed to be demolished, and how the works mentioned in that sub-paragraph. It would be helpful if the relevant paragraphs of the ES which assess the "permitted preliminary works" could be flagged up. In addition, several of the excluded works are temporary in nature. For example – • Sub-paragraph (c) includes the provision of "temporary facilities for the use of contractors"; • Sub-paragraph (f) provides for "temporary means of enclosure, fencing and site security for construction"; • Sub-paragraph (g) provides for "the temporary display of site notices or advertisements". Does the Applicant have any idea of what "temporary" might mean in each of these scenarios? Also, for sub-paragraphs (f) and (g) what will happen to the land after it has been put to its temporary use? For instance, will it be reinstated (say) to a condition suitable for its former use? Regarding fencing, the OHA assume the works falling within sub-paragraph (f) would be captured by requirement 8 (fencing and other means of enclosure) and the OHA would be grateful if the applicant could confirm this is the case.	This exclusion is deliberate and the reason for this is set out at section 3.2 of the Explanatory Memorandum **[REP1-006]**. This exclusion is required 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.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	4. Art.2(1) (interpretation) The definition of "undertaker" doesn't include SolarFive Ltd.'s registered office; however, the definition of "National Grid" includes theirs. For consistency, shouldn't SolarFive's company address be included in the definition of "undertaker"?	The Applicant agrees to this amendment and will include the company address in the Article 2(1) definition of "undertaker".	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	5. Art.2(3) (interpretation) Art.2(3) says "In this Order, references to the purposes of the authorised development includes …". Shouldn't "includes" be "include"?	The Applicant agrees and will make this correction.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	6. Art.2(4) (interpretation) Art.2(4) says all "distances, directions, capacities and lengths referred to in this Order are approximate". In the light of this, are the several references to "approximately" in schedule 12 (hedgerows to be removed) necessary?	For the avoidance of doubt, the Applicant's preference is to retain this.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7. Art.6(1)(a) (application and modification of statutory provisions) This provision seeks to disapply s.23 of the Land Drainage Act 1991. As stated elsewhere in this LIR (Chapter 6.6 (hydrology and flood risk)) OCC (the lead local flood authority) would prefer to maintain the tried and tested regime under s.23, rather than replace it with a regime which includes, for instance, shorter timeframes for determining applications. OCC therefore opposes the disapplication of s.23.	As set out at 3.2.15 of the Explanatory Memorandum **[REP1-006]**, the Applicant has sought disapplication of section 23 of the Land Drainage Act 1991 on the basis that this will be addressed through protective provisions for the protection of the relevant drainage authorities (Part 3 of Schedule 15 to the Order). To the extent that any aspects of the Land Drainage Act 1991 remain relevant to the protective provisions included for the protection of drainage authorities, these are being negotiated with those drainage authorities and agreed wording will be incorporated into the draft DCO in due course.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	8. Art.6(3) (application and modification of statutory provisions) The effect of this provision is that any hedgerow to which the Hedgerow Regulations 1997 apply can be removed if required "for carrying out any development or in the exercise of any functions that are authorised by the" Order. (This power is wide-ranging. For instance, unlike art.38(4) (felling or lopping of trees and removal of hedgerows), it does not appear to be limited to hedgerows within the Order limits). The OHAs consider the power under art.6(3) be limited to art.38(4) e.g. – "(3) Regulation 6(1) of the Hedgerows Regulations 1997 has effect as though after sub-paragraph (e) there were added— "(ea) for the purposes of article 38(4) of carrying out any development or in the exercise of any functions that are authorised by the Botley West Solar Farm Order 202[ ];" The OHA's concerns with art.38 are set out below.	The Applicant disagrees, on the basis that "carrying out any development or in exercise of any functions that are authorised" by the DCO will be limited to what powers the DCO grants to the Applicant within the Order Limits. As set out in the Explanatory Memorandum **[REP1-006]**, that wording is also consistent with the Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024.	DCO Process

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	9. Art.7 (defence to proceedings in respect of statutory nuisance) The OHAs would welcome a discussion with the applicant on the extent of this provision, particularly the proposed application of the defence (i) to the construction, operation, maintenance, use and decommissioning of the authorised development and (ii) when the matter complained of falls within a document approved under a requirement included at Schedule 2.	Article 7 provides a defence to statutory nuisance proceedings, but the Applicant must still comply with the requirements of the DCO. To the extent that the Applicant breached a matter controlled through the approved LEMP for example, it would be in breach of Requirement 6(3) of Schedule 2 on the basis that the Applicant is required to implement the LEMP. Failing to comply with the requirements of the DCO is an offence under section 161 of the Planning Act 2008 and would trigger the relevant enforcement mechanisms under that Act. The reason this defence is included within the Draft DCO is to recognise that NSIPS are of such a scale and nature that their activities can in some circumstances otherwise trigger a statutory nuisance claim. The defence provides certainty to the Applicant that such proceedings would not prevent the implementation of the Project, providing the requirements of the DCO are complied with, with the DCO being the mechanism through which environmental effects, including noise, are managed. The Applicant would welcome further discussion with the local authorities on this matter if that would assist.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	10.Part 3 (streets) OCC would welcome discussions on the Applicant's proposed highways powers which, in their current form, are too wide-ranging. For instance, and to name but four of these concerns, OCC is concerned by (i) the absence of a need for consent before carrying out the street works mentioned in article 8(1) (street works), (ii) the absence of a need for consent before carrying out the works mentioned in article 9(1) (power to alter layout, etc. of streets), and (iii) how OCC will be resourced to carry out additional highways-related work proposed by the draft DCO (iv) the lack of certainty regarding whether any streets which will be resurfaced will be resurfaced to a standard OCC considers satisfactory.	The Applicant would welcome further discussion with the local authorities on this matter if that would assist, but directs the local authorities to Article 9 which says "Where the undertaker is not the street authority, the provisions of sections 54 (notice of certain works) to 106 (index of defined expressions) of the 1991 Act apply to any street works carried out under paragraph (1)".	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	11. Art.11(4)(b) (temporary closure of public rights of way) By art.11(4)(b), the street authority's consent is required before certain streets or public rights of way are interfered with and "the street authority may attach reasonable conditions to any such consent". Similarly, by art.17(3), (discharge of water) – "The undertaker must not discharge any water into any watercourse, public sewer or drain except with the consent of the person to whom it belongs whose consent may be given subject to terms and conditions as that person may reasonably impose". There are other provisions in the draft Order which require the consent of a consenting body (for example articles 9(4)(power to alter layout, etc., of streets), 16(4)(b) (traffic regulation measures), 18(4)(a) and (b) (authority to survey and investigate the land) and 38(6)) (felling or lopping of trees and removal of hedgerows); however, these provisions are silent as to the power to attach or impose reasonable conditions. For consistency with arts.11(4)(b) and 17(3), the OHA consider the power to attach conditions should be attached to each consenting provision, as follows – Article 9(4) – "(4) The powers conferred by paragraph (2) may not be exercised without the consent of the street authority and the street authority may attach reasonable conditions to any such consent". Article 16(4)(b) – "(4) Before exercising the power conferred by paragraph (2) the undertaker must— (a) consult with the chief officer of police in whose area the road is situated; and (b) obtain the written consent of the traffic authority and the street authority may attach reasonable conditions to any such consent". Article 38(6) – "(6) The undertaker may not pursuant to paragraphs (1) and (5) fell or lop a tree or remove hedgerows within the extent of the publicly maintainable highway without the prior consent of the highway authority, and the highway authority may attach reasonable conditions to any such consent".	The Applicant does not consider that such amendments are necessary as the current wording does not prevent the relevant authority from already imposing reasonable conditions when granting consent. The current drafting is also consistent with a range of other solar DCOs granted by the Secretary of State.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	12. Art.11 (temporary closure of public rights of way) and art.11 (permanent closure of public rights of way) The OHAs concerns with the public rights of way provisions are set out in Chapter 6.9 (traffic and transport (including public rights of way)). The OHAs would welcome a discussion on those concerns with a view to agreeing the best way forward.	The Applicant would welcome further discussion with the local authorities on this matter if that would assist. The Applicant assumes the reference regarding permanent closure of public rights of way is to Article 12, rather than Article 11.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	13. Art.15 (agreements with street authorities) Officers are concerned by the scope of the powers proposed under Part 3; however, it is possible most concerns can be addressed by making the proposed works under Part 3 subject	The Applicant would welcome further discussion with the local authorities on this matter if that would assist.	DCO Process

Name	Comment	Applicant's Response	Issues
	to an agreement drafted in line with OCC's standard highways agreement. OCC will share this with the Applicant and would welcome discussions on the same.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	14. Art.16(7)(a) and (b) (traffic regulation measures) These provisions refer to the "instrument" which must include any provision made by the undertaker under art.16(1) or (2). OCC considers it would be helpful if a copy of the made instrument were made available by the undertaker and also sent to OCC. In the light of this, OCC would suggest a new art.16(8) to provide as follows – "(8) A copy of the instrument referred to in paragraph (7)(a) must be held at the registered office address of the undertaker for inspection during normal working hours and, as soon as reasonably practicable after being made, a copy must be served on the highway authority".	This provision is typical of a number of solar DCOs and the Applicant expects that the written instrument will be of a similar form to that provided by other undertakers. We note that that Article 16(5) requires publication of the undertaker's intention to exercise the relevant powers to the chief officer of the police and the relevant traffic authority. The undertaker is also required to provide notice in relevant newspapers that the provisions relate to. On that basis, there is already a clear notice mechanism prior to the powers being exercised and the Applicant does not consider any further amendments are required.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	15. Art.20(3)(b) (time limit for exercise of authority to acquire land compulsorily) The OHA consider the extension provided under art.20(3)(a) is satisfactory and there is no need for art.20(3)(b). Owing to this, the OHA consider art.20(3) should be recast as follows – "The authority conferred by article 29 (temporary use of land for constructing the authorised development) must not be used after the end of the applicable period referred to in paragraph (1), save that if an application is made under section 118 of the 2008 Act (legal challenges relating to applications for orders granting development consent) the applicable period is to be extended by a period equivalent to the period beginning on the day the application is made and ending on the day it is withdrawn or finally determined".	The Applicant's preference is to retain the current wording, consistent with a range of other solar DCOs.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	16. Art.35 (consent to transfer the benefit of the Order) If the benefit of the Order is transferred, each of the OHA wish to be notified of the same and request that art.35 is amended accordingly.	The notification process under Article 35 is related to the Secretary of State's specific role within this Article, so that they hold a record of what benefits have been transferred, and what of those benefits have or have not required its consent. The Applicant considers the proposed amendment to be inappropriate on the basis that: • The OHA do not have any role in granting consent for the transfer of benefits; • There is no separate provision for notification of other parties regarding the transfer of benefits that the Secretary of State consents to; • The current wording is consistent with a range of other recently consented Solar DCOs, including East Yorkshire and West Burton.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	17. Art.38 (felling or lopping of trees and removal of hedgerows) By article 38(4), the undertaker may "… undertake works to or remove any hedgerows within the Order limits that may be required". Paragraph 22.1 of PINS Advice Note Fifteen: drafting Development Consent Orders states – "Applicants may wish to include an Article within the draft DCO to allow the removal of hedgerows (if necessary) for the purposes of carrying out the Authorised Development. The draft DCO can include an Article with powers which remove the obligation on the Undertaker to first secure consent under The Hedgerows Regulations 1997 …It is recommended that DCO Articles of this kind are made relevant to the specific hedgerows intended for removal. To support the ExA, the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority". The draft DCO does not include a Schedule and plan identifying the hedgerows to be removed under article 38(4). Similarly, the requirement to obtain consent under art.38 is limited to the scenario described in art.38(6) i.e. when proposing to "remove hedgerows within the extent of the publicly maintainable highway" when the highway authority's consent is required. In the light of the above, the OHA consider art.38(4) should be amended to reflect the advice mentioned above.	The specific hedgerows to be removed are captured within Schedule 12 of the DCO. As the hedgerow removal plans is an Approved Document subject to Requirement 3 of Schedule 2, amendments to the hedgerow removal plans must not be given unless the relevant planning authority is satisfied that the amendment is unlikely to give rise to materially new or materially different environmental effects. There are a range of other mechanisms within the draft DCO that prevent the general use of hedgerow removal powers in a manner that would generate materially different environmental effects to what have been assessed in the ES. In particular, the CoCP and LEMP must be prepared and approved by the relevant planning authority prior to commencement. The CoCP must include a CTMP. To the extent that these are developed in a way that is inconsistent with the hedgerow removal plans: • Depending on the inconsistency, they may not satisfy the relevant requirement of being in "substantial accordance" with the outline plan; or • Under Schedule 16, paragraph 2(3), any applications made to the relevant planning authority to discharge a requirement must 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. Again, to the extent that removal of hedgerows not identified in Schedule 12 would result in discharge of a requirement in a way that has materially different environmental effects, it would be open to the relevant planning authority to refuse to discharge the requirement.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	18. Art.39 (trees subject to tree preservation orders) Paragraphs 22.2 and 22.3 of PINS Advice Note Fifteen: drafting Development Consent Orders state – "22.2 Applicants may also wish to include powers allowing them to fell, lop or cut back roots of trees subject to a Tree Preservation Order (TPO). This power can extend to trees which are otherwise protected by virtue of being situated in a conservation area. To support the ExA inclusion of this power should be accompanied by a Schedule and plan to specifically identify the affected trees. 22.3 Trees subject to TPO and/ or are otherwise protected (and likely to be affected) should be	Consistent with the recently consented East Yorkshire DCO, the Applicant does not consider that a schedule identifying specific trees for removal is necessary, noting the comprehensive mitigation package already proposed for trees affected by the Project within CoCP and LEMP. Moreover, 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:	DCO Process

Name	Comment	Applicant's Response	Issues
	specifically identified. It is not appropriate for this power to be included on a precautionary basis. Proper identification of affected trees will enable the ExA to give full consideration to the particular characteristics that gave rise to their designation and the desirability of continuing such protection". In the light of the advice mentioned above, the OHA consider this article should be accompanied by a Schedule and Plan.	"*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 Applicant therefore maintains that the general power is suitably controlled.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	19. Art.45 (procedure in relation to certain approvals etc.) Sub-section (2) states – (2) Where paragraph (1) applies to any consent, agreement or approval, such consent, agreement or approval must not be unreasonably withheld or delayed. By art. 45(4) if within 8 weeks after the application for consent has been submitted to a consenting authority the authority has not notified the undertaker of its disapproval, it is deemed to have approved the application for consent. Owing to the deeming provision, the OHA do not consider the reference to delaying consent in art.45(2) is necessary and so the words "or delayed" should be omitted.	The Applicant considers it appropriate for this to remain, on the basis that while the deeming mechanisms are intended to provide a ceiling within which the consenting authority must respond regarding an approval, the consenting authority should still avoid unreasonable delays in providing approvals. There may be circumstances, depending on the approval in question, where a delay is unreasonable but the deemed provision has not been engaged.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	20. Requirements: general (phasing scheme) Most solar DCOs include a requirement which require the submission of a written scheme setting out the phase or phases of construction, which includes a timetable for the construction of the phase or phases and a plan identifying the phasing area. Examples include – Cleve Hill Solar Park Order 2020 (SI2020/547), Little Crow Solar Park Order 2022 (SI2022/436), Longfield Solar Farm Order 2023 (SI2023/734), Mallard Pass Solar Farm Order 2024 (SI2024/796), Gate Burton Energy Park Order 2024 (SI2024/807), and Cottam Solar Project Order 2024 (2024/943). An example of such a requirement is – No part of the authorised development may commence until a written scheme setting out the phase or phases of construction of the authorised development has been submitted to the relevant planning authorities. The written scheme submitted pursuant to subparagraph (2) must include a timetable for the construction of the phase or phases of the authorised development and a plan identifying the phasing area. The scheme submitted and approved pursuant to sub-paragraph (2) must be implemented as approved. Notice of the date of final commissioning must be given to the relevant planning authority within 15 working days of the date of final commissioning for that phase. The OHA would welcome the inclusion of such a requirement because being provided with the scheme (particularly the timetable) would allow the relevant planning authorities to prepare resources for discharging requirements etc.	The Applicant does not consider it necessary or appropriate for a phasing requirement to be included in the DCO. Some flexibility is required over the construction phase, taking into account matters such as supply chain, weather conditions and availability of contractors. As the ES has assessed an approximate construction phase, based on a reasonable worst-case effects envelope for construction related effects, there is no specific effects management basis for including a phasing requirement. The Applicant will however maintain an open dialogue with the OHAs through the detailed design and construction phases of the Project and will ensure OHAs are aware of any matters requiring their input.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	21. R.2 (commencement of the authorised development) Requirement 2 states: "The authorised development must not begin after the expiration of five years from the date this Order comes into force". [Emphasis added]. For consistency with the term used elsewhere in the Order, the OHA consider "begin" should be replaced with "commence".	If the term 'commence' was used, then the carrying out of the permitted preliminary works would not discharge requirement 2 because such works are excluded from the scope of 'commencement'. Therefore, even though the Applicant would have started taking steps to deliver the proposed development, the DCO may nonetheless expire if no 'commencement' works (i.e. non PPWs) had been carried out. From a timing and cost perspective, this is overly burdensome because many of the Requirements are to be discharged prior to 'commencement'. Therefore, in order to 'commence' those works, each of the pre-commencement Requirements would need to first be discharged before the DCO is no longer at risk of lapsing. Therefore, the use of "begin" in Requirement 2 is because it is intended to align with the definition of the word "begin" in section 155 of the 2008 Act (section 155) which is broader than the definition of 'commencement' of the DCO. i.e. It includes that development is "*taken to begin on the earliest date on which any material operation comprised in, or carried out for the purposes of, the development begins to be carried out*". The Applicant is looking to avoid a situation similar to that which arose in the *TIDAL LAGOON (SWANSEA BAY) PLC* (2022), where the restricted definition in the DCO meant that many of the pre-commencement "material operations" would not, even if undertaken, qualify to "commence" the development within the time limit, whilst they would qualify to "begin" the development under section 155. This meant the DCO lapsed. However, for the avoidance of doubt, to reflect the deliberate use of the term "begin" instead of "commence", the Applicant proposes the following further amendment to the heading of Requirement 2: *~~Commencement~~Beginning of the authorised development*	DCO Process

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	22. R.5(1) (detailed design approval) Other solar farm orders which include this requirement require the undertaker to provide, under sub-paragraph (1),additional details. For example, Requirement 2 of the Cleve Hill Solar Park Order 2020 (SI2020/547) includes the 7 items listed in R5(1) and the following – "(h) drainage, water, power and communications cables and pipelines; (i) programme for landscaping works; and (j) fencing," Requirement 5(1) of the the Gate Burton Energy Park Order 2024 (SI2024/807) includes the three additional items mentioned in Cleve Hill and also — "(k) security measures; and (l) any mitigation measures necessary to address noise impacts". Shouldn't this information also be submitted to the relevant planning authority under R.5(1) of the instant Order? Also, the equivalent of R.5(2) in the Cleve Hill and Gate Burton Orders require the submitted details to accord with the works plan. Shouldn't that document also be referred to in R5(2) of the instant order?	The Applicant does not consider it necessary for the additional measures identified by the OHA to be included in Requirement 5, on the basis that other matters, for example matters relating to landscaping works, security, and noise mitigation are appropriately considered through the relevant management plans for each phase (such as the CoCP, OEMP, and LEMP). These plans must be prepared substantially in accordance with the outline plans, also prior to commencement. That approach is also consistent with the recent East Yorkshire DCO. The Applicant cannot see what specific purpose reference to the work plans within Requirement 5 would be, and welcomes further explanation from the OHAs as to why they consider such inclusion to be necessary.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	23. R.7 (biodiversity net gain) The OHAs consider that sub-paragraph (2) should be amended as follows – "(2) The biodiversity net gain plan must be substantially in accordance with the outline landscape and ecology management plan and the biodiversity net gain statement and must be implemented as approved and maintained throughout the operation of the relevant part of the authorised development to which the plan relates". The biodiversity net gain statement sets out the approach to BNG adopted by the project and is set out in ES Volume 3, Appendix 9.13 **[APP-162]** and so its inclusion in R.7(2) is appropriate on this basis. The OHAs note that Requirement 9 of the Cottam Solar Project Order 2024 (2024/943) includes the following subparagraph - "The biodiversity net gain strategy must include details of how the strategy will secure a minimum of 76.8% biodiversity net gain in habitat units, a minimum of 56.1% biodiversity net gain in hedgerow units and a minimum of 10% biodiversity net gain in river units for all of the authorised development during the operation of the authorised development, and the metric that has been used to calculate that those percentages will be reached". The OHAs consider it would be helpful if a similar provision (albeit with updated figures etc.) were included in requirement 7 of the instant Order.	The Applicant does not consider any amendment to Requirement 7 is required on the basis that the oLEMP will require each LEMP to demonstrate how the Project contributes to the achievement of BNG.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	24. R.8 (fencing and other means of enclosure) As explained in Chapter 6.3 (historic environment) of the LIR, the OHA consider a specific heritage related requirement is required in respect of the Grade II listed Milestone located on Oxford Road and this could be included at the end of existing Requirement 8, as follows – "(7) No part of the authorised development may commence until a detailed scheme of protection for the Grade II listed Milestone located on Oxford Road (NHLE number 1181978) ("the Milestone") has been submitted to and approved by the relevant planning authority. (8) The scheme mentioned in sub-paragraph (7) must - (a) explain how the Milestone will be protected by fencing during the construction and decommissioning of the authorised development; and (b) be implemented as approved. This addition to R.8 is required to protect and safeguard the milestone during construction and decommissioning.	Chapter 7 - Historic Environment of the ES **[APP-044]** assessed potential effects of the Project on the Oxford Road Milestone. It was concluded that there would be only minor residual adverse effects, with no further mitigation or monitoring required. On that basis the Applicant does not consider it necessary to include a specific requirement within the draft DCO providing specific protections for the Milestone.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	25. R.10 (archaeology) As explained in Chapter 6.3 (historic environment) of the LIR, the OHA consider existing R.10 should be supplemented with new sub-paragraph (4), namely – "(4) Within two years of the completion of the archaeological mitigation fieldwork an updated project design and post excavation assessment detailing all processing, research and analysis necessary to produce and secure the delivery of an accessible and useable archive and a full report for publication must be submitted to and approved in writing by the relevant planning authority". In addition, should the reference in sub-paragraph (2) to "sub-paragraph 8(1)" be replaced with "sub-paragraph 10(1)".	The Applicant seeks further clarification from the OHA as to the basis on which this should be included in Requirement 10, and what it would be intending to capture that the Written Scheme of Investigation is not addressing. The Outline Written Scheme of Investigation **[APP-237]** sets out an archiving and reporting process for recording the findings and preparation of a post-excavation assessment report. The Written Scheme of Investigation must be substantially in accordance with the Outline Written Scheme of Investigation.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	26. R.11(2) (code of construction practice) As explained in Chapter 6.5 (Ecology, Nature Conservation and Trees) of the LIR, the OHA consider that, under sub-paragraph (2), the code of construction practice should also include a construction environmental management plan. A draft construction environmental management plan should be submitted into the examination as soon as possible and officers would we willing to discuss its proposed contents after Deadline 2.	The Applicant seeks further clarification from the OHA as to what specific measures they consider would be captured by a construction environmental management plan that are not already captured by the management plans already proposed for the Project.	DCO Process

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	27. R.14 (decommissioning and restoration) The OHAs note that Requirement 21(2) and (3) of the Cottam Solar Project Order 2024 (2024/943) differ from R.14 of the instant draft Order as follows – "(1) The date of decommissioning must be no later than37.5 years following the date of final commissioning. (2) Unless otherwise agreed with the relevant planning authority to which this requirement applies, no later than 12 months prior to the date the undertaker intends to decommission any part of the authorised development, the undertaker must notify that relevant planning authority of the intended date of decommissioning for that part of the authorised development. (3) Unless otherwise agreed with the relevant planning authority to which this article applies, no later than ten weeks prior to the intended date of decommissioning of any part of the authorised development notified pursuant to sub-paragraph (2), the undertaker must submit to that relevant planning authority for that part a decommissioning plan for approval". The OHAs consider it would be helpful if the notification mentioned in R.21(2) of the Cottam order was also provided to the relevant planning authority under the instant draft Order. Similarly, the OHAs would welcome the slightly longer notification period of 10 weeks in respect of the submission of the decommissioning plan.	The Applicant agrees to the inclusion of the new requirement 21(2) as proposed by the OHA, requiring the Applicant to provide notice of the date it intends to commission any part of the Project. In respect of a longer period of 8 weeks under Requirement 21(3) for providing the relevant part of the decommissioning plan, Schedule 16 already provides an 8 week timeframe for discharging requirements, as does the general deemed approval procedure under Part 2 Article 45. Such timeframes should remain consistent within the Draft DCO as otherwise the decommissioning plan could be deemed to be approved while the relevant planning authority is still within the 10 week period if specified under Requirement 14. We note that it would be open to the Applicant to provide documents to the relevant planning authority sooner and that the Draft DCO is intended to provide for the minimum time period within which the decommissioning plan must be provided. The Applicant also does not consider this to be necessary, particularly if an additional notice mechanism is being introduced 12 months in advance of decommissioning. This gives the relevant planning authority plenty advance warning that the decommissioning plan or relevant part is to be provided for approval.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	28. Proposed new requirement (1) As mentioned in paragraphs 6.5.51 to 6.5.53 of Chapter 5 (Ecology, Nature Conservation and Trees) of the LIR, the OHA consider there should be new a requirement providing for the submission of a farmland bird strategy.	The Applicant cannot identify a proposed new requirement from the reference provided, but would welcome consideration of this further if a reference can be provided.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	29. Proposed new requirement (2) During Issue Specific Hearing 1, there was a discussion on whether a Grampian condition should be included in the draft DCO preventing the undertaker from (i) exercising compulsory purchase powers and (ii) commencing the authorised development until planning permission has been granted for the proposed National Grid substation. The OHAs consider such a provision would be sensible because it would ensure that infrastructure which is important to the instant application has been consented before the instant works can be commenced.	The Applicant's position, as set out at Issue Specific Hearing 1, remains that a Grampian condition is not necessary. Please refer to the Applicant's Written Summary of Oral Submissions at Issue Specific Hearing 1 **[REP1-019]**.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	30. Proposed new requirement (3) Prior to the commencement of the development, it is anticipated that works will have recently been completed on the A40 and the OHAs would not want these to be dug up under powers contained in the DCO (for instance, for the purposes of installing the authorised development's cable route). In the light of this, the OHAs consider the draft DCO should include a provision which prevents this happening. As matters stands now, the OHA's understand the cable route could cross the area of recently completed works. The OHAs would like clarity that the undertaker will either avoid the refurbished section of road or utilise HDD at a sufficient depth to prevent any harm to the new road. The OHAs consider this could be secured via a requirement to submit details of any proposed cable crossing of the A40 prior to them starting works on that section of the cable routing.	The Applicant refers to **[APP-062]** 6.4 of the ES - Figures 2.1a - 2.4d - Illustrative Masterplan Figure 2.2F Central site area 6 of 6 which indicates the location of the cable route crossing the A40 road. It is noted that OHA's have stated that there is the intention to re-surface this area of road. The Applicant has been in discussions with OCC highways team, and has agreed that any prior works to the roads, and surface will be advised, in advance of the works commencing by OCC highways team, to enable the Applicant to manage their phasing and workstreams to minimise the damage to newly completed works. The Applicant will use all reasonable endeavours to achieve this, but due to programme and logistical constraints this may not always be achievable. In relation to and HDD to this crossing of the A40, this option was considered, but there was not a location for an exit point for the HDD, therefore open cut trenching was discussed with OCC in this location. As the Applicant cannot control the nature and timing of the works proposed to the A40, it is not realistic to include a Requirement within the DCO that prevents the Applicant from undertaking works in this location where necessary to deliver the Project. However, the Applicant acknowledges that there is a need to work closely with the OHAs in delivering works in this area, and commercially motivated to do this in the most efficient and effect manner possible on the basis that any damage to the road from cabling works will need to be remediated.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	31. Proposed new requirement (4) The OHAs are concerned by the prospect of the consequences arising from panel replacement works on the road network and waste management sites. The OHAs consider these concerns could be addressed by including a requirement which requires the undertaker to submit a document like the decommissioning plan (and which would include provision for traffic and waste management) for the replacement panels when the number of panels to be replaced exceeds (say) 50 panels.	The Applicant does not consider that such a requirement is necessary, with the Applicant already assessing the worst-case scenario in terms of effects from the Operational Phase, including replacement activities. The Outline Operational Management Plan **[APP-234]** requires the Applicant to prepare an Operational Waste Management Plan (OWMP) for managing waste from operational phase activities, including replacement. Traffic effects from this phase are assessed as being negligible.	DCO Process
Joint Local Impact Report of CDC, VWHD, WODC and OCC	32. Schedule 16 (procedure for discharge of requirements) –paragraph 5 (fees) The first point to make is that while the relevant planning authorities will be required to deal with applications for consent under articles and under requirements, by paragraph 5(1) of Schedule 16, a fee is only payable in respect of requirements. The OHAs consider that a fee should also be paid for dealing with applications under articles. The Council's approach is consistent with the standard drafting for a provision dealing with procedure for the discharge of approvals, as set out in Appendix 1 to PINS Advice Note 15, which concerns drafting DCOs.	The Applicant notes that the ability of the relevant planning authority to recover fees prescribed in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 has precedent from a number of other Solar DCOs, as set out in the Explanatory Memorandum **[APP-017].** Recognising the OHA's concerns about the sufficiency of those regulations, the Applicant notes the DCO provides flexibility for adjustments to these fees to reflect future amendments to the regulations, through the wording "as may be amended or replaced from time to time".	DCO Process

Name	Comment	Applicant's Response	Issues
	The second point to make is that the proposed fee is too low. Paragraph 5(1) applies the fee prescribed in regulation 16(1)(b) of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. This amounts to £145. If we assume an hourly rate of £100 for an officer to deal with this work, it would mean the officer would have to deal with any discharge application within approx.1 hrs and 24 minutes before dealing with the application was costing the relevant authority money. It is unlikely that any application will be capable of determination within that time period. While no local authority can make a profit for this work, it is reasonable for it to seek the full recovery of the actual costs incurred. This is not only about fairness but also about the way in which the Order is drafted. For example, by paragraph 2(2) of Schedule 16, the relevant planning authority will have 8 weeks to make its decision on any application and if no decision is made within that period, consent will be deemed to have been granted. By article 45(4) of the Order, a similar regime applies in respect of consents sought under articles. Dealing with any application for consent under this Order will therefore be a matter of high priority for the relevant planning authority and it is possible that external help will be sought to ensure matters are dealt with on time. Rather that the regime currently proposed in the Order, the OHAs considers it would be preferable if the Applicant and OHAs entered into a planning performance agreement ("PPA") for the full recovery of the OHA's costs in discharging any application under the Order. The OHAs consider there is enough time to agree a PPA during the Examination and would be willing to share a first draft of such an agreement with the Applicant in order to progress matters. Once the PPA is agreed, existing paragraph 5 can be replaced with a provision which states fees for applications will be paid in accordance with the PPA.	The Applicant does not consider it necessary for there to be a general cost-recovery mechanism for provision of approvals under the DCO, but welcomes further engagement with the OHA on exploring the potential for planning performance agreements.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The approach and methodology used in the LVIA **[PDB-006]** underplays the impact of the development. The LVIA assesses the development as not causing significant effects on the landscape character, and with regard to visual effects, no significant effects are anticipated by year 15.	The Applicant notes the OHAs' concerns - please see the Applicant's response, below.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The OHA are concerned that the LVIA is not clear in how it has been used to inform the siting, scale and design of the scheme, including master planning to avoid areas of most significant landscape and visual impacts and how landscape character and visibility have been used to inform the mitigation strategy.	Extensive fieldwork was undertaken during the development of the master plan. The findings from the fieldwork and from other desk-based sources, including from other topic specialists, were used inform the landscape proposals, as part of the overarching master plan. The Applicant notes the OHAs' concerns. Due to the Change Request outlined in the Change Notification (Document ref EN010147 Notification of Intention to Submit a Request to Change the Application (Change Request 2)) the extent of the solar panels will change. For further details on the landscape proposals please see the Applicant's response below.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The OHA are concerned that the proposed mitigation methods such as hedges around Public Rights of Way will fundamentally change the way the landscape and views are appreciated.	It is acknowledged that the proposed mitigation planting would result in a change in views available within the landscape. The proposed landscape mitigation occasionally acts as a partial screen, channelling views and impeding open aspects, these effects would only occur within a short section of routes, with typically wider views. However, with the undulating nature of topography and suitable widths for PRoW corridors, views of the wider landscape and key features such as church spires, distinctive landforms (including Burleigh Wood) would remain open and available to visual receptors.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Landscape and Visual Impact Assessment The applicant should revisit their LVIA assessment and address concerns raised with regards to methodology/scope/ process, baseline information, assessment of effects, mitigation & design and visualisations. Issues to be addressed include (more information is covered below): • The duration, geographical extent, reversibility, cumulative effects, thresholds of significance, assessments of effects, effects of lighting especially during construction and worst-case scenario winter year 15. • Revising the landscape character assessment including addressing issues regarding landscape susceptibility, judgements regarding landscape sensitivity, assessment of landscape character and landscape features of the site, providing information on sensitivity of the site, the assessment of landscape effects during construction and operation on site and landscape character areas "LCAs" / landscape character types "LCTs" and the approach taken in assessing and describing effects on landscape character. • Revising the visual assessment including visual susceptibility to local communities, judgements regarding visual sensitivity, the assessment of visual effects on PRoWs, the viewpoint assessments where levels of effects have reduced between years 1 and 15 but where the proposed planting will not provide any screening.	The Applicant notes the OHAs' concerns - please see the Applicant's response, below.	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
	• Revisit the LVIA with regards to providing further information on how landscape and visual matters have informed landscape mitigation proposals and reconsider the appropriateness of the proposed mitigation measures where new planting will completely change the experience afforded to users of PRoWs. • Revisit the assessment with regards to the relationship of the site with the Cotswolds National Landscape including landscape and visual effects and the visual effects on visitors to Blenheim Palace Park and Gardens. • Clarity regarding the justification for scoping out the Residential Visual Amenity Assessment (RVAA), as the current reasoning in the LVIA appears flawed. • Revisit the visualisation methodology including ZTV production, photography height, field of view of the proposed development, single frame visualisations, modelling of visualisations, accuracy of visualisations, annotations of viewpoints, including the scheme layout on location plans. • Improve the provided mapping for the scheme to aid understanding, including providing a plan combining the proposed layout of the scheme with locations of photo viewpoints and numbered PRoW routes. Improved mapping of the locations of schemes considered in cumulative assessment in association with the scheme layout should also be provided. • The OHA would like the revised LVIA work to inform the siting, scale and design of the scheme including creating a Constraints and Opportunities plan to aid the master planning of the site. Panels should be removed from the scheme where they cause significant harm to landscape character and visual amenity. The applicant should revisit their proposed mitigation to ensure it does not impact on the way in which landscape and views are appreciated.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Appendix 1: Botley West Solar NSIP Advice on Landscape and Visual and Heritage Matters prepared by LUC May 2025 LVIA Review: Overall, it appears that the landscape and visual effects reported in the LVIA have been underplayed and some methodological issues are also highlighted. The lack of the above elements makes difficult to accurately and fully understand the impact and effects upon the landscape and on visual amenity. The Applicant is therefore requested to: • Revisit the methodology applied to the assessment to ensure and clarify that: – the duration of the project has been correctly considered (i.e. the long-term nature of the operation phase should be considered as part of the magnitude of change). – the reversibility of the project has been correctly considered (as aspects of the development such as earthworks, and the mitigation planting will not be reversible). Confirmation is also required as to what will happen to the substation/s and access tracks beyond the operational phase. – detailed information regarding the production of the ZTVs is provided (including how the heights of existing buildings and vegetation have been derived), and to provide clarity as to if a worst case 'bare earth' ZTV has been included or not. – the geographical extent, duration and reversibility has been correctly considered for the visual assessment for the representative viewpoints. – the assessment of cumulative effects considers the full scenario, whereby multiple projects may coexist in the landscape. • Revisit the threshold of significance which currently considers effects of Moderate or less to not be significant (given the definition provided for a medium magnitude of effect sounds like a significant effect). – Provide an updated assessment as currently the significance of effects appear to have been downplayed. • Provide an assessment that considers the effects of lighting, including temporary lighting during construction, or stronger justification as to why this has been scoped out. • Provide confirmation that the exclusion of the Residential Visual Amenity Assessment (RVAA) was agreed with relevant consultation bodies, and clarity regarding the justification for scoping it, out as the current reasoning appears flawed. The proposed 25m offset for properties, settlements and communities requires consideration on a case by case basis, so that aspects such as topography and vegetation are fully considered. A standard 'buffer'	**LVIA Methodology** <u>Over-arching guidance</u> The EIA Regulations do not prescribe or define: • Methodology • Categories of effects • Significance thresholds, i.e. when an effect is significant or not. The Guidelines for Landscape and Visual Impact Assessment: Third edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) is the Landscape Institute's and IEMA's guidelines for LVIA. This guidance and the subsequent technical guidance notes published by the Landscape Institute for the basis for the methodology used at Botley West Solar Farm. The methodology tailored for the assessment of the Proposed Development is based on the GLVIA3 which recommends that an LVIA *"concentrates on principles and process" and "does not provide a detailed or formulaic recipe"* to assess effects, it being the *"responsibility of the professional to ensure that the approach and methodology are appropriate to the task in hand"* (preface to GLVIA3, Roman numeral page x). <u>Significance of effects</u> On determining significance of effects GLVIA3 explains that *"there are no hard and fast rules about what effects should be deemed 'significant'…"* (GLVIA3, paragraph 3.32). Paragraph 3.33 explains that *"It is not essential to establish a series of thresholds for different levels of significance of landscape and visual effects, provided it is made clear whether they are considered significant."* Landscape Institute Technical Guidance Note-2024-01: Notes and Clarifications of Aspects of Guidelines for Landscape and Visual Impact Assessment: Third Edition (GLVIA3) (Landscape Institute, August 2024) (LITGN-2024-01) provides guidance on 'Moderate' significance of effects at 3(5) *"…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."* The use of matrices is addressed at LITGN-2024-01 3(6) which explains that they *"can be useful as a means of illustrating to the reader how judgements are combined and can support and summarise narrative descriptive text (GLVIA3 paragraph 8.10) but they should not dictate judgements. LVIA is a means of documenting professional judgement, rather than a formulaic process."*	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues

approach is unlikely to be sufficient in terms of mitigation of significant effects at all locations.

- Revisit the approach to assessing and describing the landscape and visual effects at year 15 ensuring that the worst-case scenario (i.e. winter) has been assessed.
- Provide clarification as to how the judgements (and their definitions) of susceptibility and value correspond to sensitivity by revisiting Tables 8.9 and 8.10.
- Revisit and expand the criteria used for landscape susceptibility to clearly set out the characteristics of the landscape which are being considered to determine its susceptibility.
- Revisit and expand the criteria used for visual susceptibility to ensure that consideration has been given to local communities, and that they have been appropriately assessed. The LVIA does not state why local communities have been scoped out, and given the scale of the Proposed Development and the number of settlements surrounding the Site, the apparent exclusion of local communities is considered to be an omission.
- Revisit the judgements regarding landscape and visual sensitivity (Tables 8.15 and 8.17 respectively) to provide justification as to how each sensitivity rating has been reached, in terms of the contribution of judgements on susceptibility and value.
- Provide a clear summary of the landscape character and landscape features of the Site, and show how the descriptions from the various published landscape character assessments, GI Strategy etc have informed the proposed landscape and visual related mitigation / design. Set out clearly the lengths and areas of vegetation to be lost (including numbers and quality of trees), as well as the lengths of new hedgerows /numbers of new trees etc. Consider the planting of copses of woodland to help reduce effects, where appropriate to landscape character.
- Provide further information relating to the sensitivity of the Site, which appears to be missing.
- Revisit the judgement of sensitivity relating to the Cotswolds National Landscape (Table 8.16) and consider the national landscape as having a 'very high' sensitivity, or provide justification as to why it has been judged to have the same level of sensitivity (high) as users of public rights of way and access land.
- Provide an assessment that considers the visual effects on visitors to Blenheim Palace Park and Gardens, or justification as to why this has been scoped out.
- Revisit the assessment of landscape effects during construction and operation on the Project Site and the host LCA/LCTs, as effects have been understated as it is considered that locally significant effects on landscape character are inevitable given the extensive change in land use across a site of this scale.
- Revisit the approach taken to assessing and describing the effects on landscape character – drilling down to the character area level, rather than expressing impacts at the level of the 'LCA as a whole' and providing greater spatial specificity as to where impacts will be concentrated, how this will vary spatially and how this could/should shape design. – It is anticipated that this information will provide important context to inform judgements on where design changes may be required.
- Revisit the assessment of landscape and visual effects on the Cotswolds National Landscape as effects appear to have been understated, and provide a representative viewpoint from it (e.g. from Wychwood Way walking trail at Combe), so that the effects on the National Landscape can be fully understood.
- Revisit the assessment of visual effects on PRoWs as there are several inconsistencies with the methodology as noted in this review. Ensure sequential effects on users are fully considered, noting the nature and frequency of views (in summer and winter conditions).
- Revisit viewpoint assessments where the levels of effect have been reduced between years 1 and 15, but where the proposed planting will not provide any screening.

Applicant's position

The methodology used to assess the landscape and visual effects of the Botley West Solar Farm follows the standard best practice guidance as set out in the GLVIA3 and subsequent technical guidance notes, published by the Landscape Institute.

Specific aspects of LVIA methodology - duration and reversibility

Duration

NPS EN-3 notes that *"Forty years is typical for the project lifetime for a solar farm*" (paragraph 2.10.65).

NPS EN-3 also provides guidance on whether solar farms are considered temporary at paragraph 2.10.66 *"Time-limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed."*

GLVIA3 considers duration at paragraph 5.51 and notes that it can simply be on a scale of short, medium or long term, with definitions of what the project considers each category to be, noting that there is no fixed rule on these definitions.

The duration and reversibility of landscape and visual effects are based on the period over which the Proposed Development is likely to exist (during construction and operation) and the extent to which the Proposed Development will be removed (during decommissioning), with effects reversed at the end of that period. The duration of the impact is considered using the following terms:

- long-term – more than 10 years (may be defined as permanent or reversible)
- medium-term – 6 to 10 years
- short-term – 1 to 5 years.

Reversibility/decommissioning

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."*

GLVIA3 provides guidance on reversibility at paragraph 5.52, *"Reversibility is a judgement about the prospects and practicality of the particular effect being reversed in, for example, a generation…" Renewable energy developments are often argued to be reversible since they have a limited life and could eventually be removed and/or the land reinstated."*

Magnitude of landscape and visual impacts

GLVIA3, paragraph 3.24 explains that *"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."*

The relative weighting of the three main factors is not specifically discussed in the GLVIA3. However, it notes that landscape professionals use different approaches depending on the type of development.

The LVIA methodology used within ES chapter 8, considers the different factors of impact magnitude together. The LVIA methodology applies different weight to these factors. Size and scale having the most influence, but modified by geographical extent, duration and reversibility. Therefore, the overall magnitude of change is less than the size and scale of the impact alone. This approach is supported by LITGN-2024-01 at 3(3) *"…it is likely that the size/scale of effect will be the most important factor, with geographical extent and duration/reversibility considered as 'modifiers'."*

For development of the nature of the Botley West Solar Farm, which, barring the substation, is low in height, with limited visual influence within the agreed 5 km study area, most of the publicly available views are located close to the site. Taking account of the site's location and the degree of landscape and other mitigation the approach to assessing impact magnitude, used in the chapter and explained above, was considered logical and proportionate.

The effects during the construction and decommissioning periods, are temporary in nature, but also short-term in duration. During these phases the duration has a greater influence in modifying the magnitude of impact, i.e. the impact may be temporarily greater than at the operational phase, but the duration would be shorter.

Name	Comment	Applicant's Response	Issues
	• Provide or refer to a mapped figure illustrating the locations of the schemes considered in the cumulative assessment. • Provide the Examining Authority and relevant parties with further information on how landscape and visual matters have informed landscape mitigation proposals. • Re-consider the appropriateness of the proposed mitigation measures where new planting will completely change the nature and openness of the view, and the experience afforded to users of PRoWs. In particular, consider the nature of the planting, its proposed height and the way it is to be managed (traditional techniques such as laying should be employed).	The only landscape receptor likely to experience construction and decommissioning impacts that are different in nature to the operational impacts is the footprint of the site itself, which would temporarily (short-term) take on the character of a construction site. While the impacts would be different in nature to those experienced once the Project is complete, they would, on balance, be similar in terms of their impact magnitude. The construction and eventual decommissioning of The Project would also be short-term, involving the movement of vehicles, localised excavations and the installation of the panels using small-scale construction machinery. Neither construction nor decommissioning activities would give rise to impact magnitudes over and above those of the winter Year 1 operational phase. During the early part of the operational period, effects are likely to be at their greatest. The effects of the Project during the operational phase are assessed at winter Year 1, with newly planted mitigation is and again at summer Year 15, in the intervening years the mitigation planting will gradually establish and magnitude of impact attributable to the Project will reduce. Therefore, the effects over this period are not equal to permanent effects. Although the period is considered long-term, the effects attributable to the mitigation planting would gradually take effect and balance the effects attributable to the infrastructure elements. This incremental positive change to landscape character and to views has been factored into the magnitude of change. The residual/permanent effects are assessed with the proposed mitigation planting at Year 15. At winter Year 15 the views experienced by visual receptors would be similar to those experienced in summer Year 15, given the height and width of the proposed landscape mitigation and the height of the solar panels. <u>Applicant's position</u> The Botley West Solar Farm is time-limited, temporary and fully reversible. This does not mean that baseline views will remain the same, but any physical harm attributable to the solar panels would be addressed during the decommissioning phase. The introduced mitigation planting, apart from providing screening effects and assisting in the integration of the Project into the landscape, follow the landscape character areas' management guidelines and would also provide biodiversity enhancement. 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 and proposed landscape mitigation takes account of and reinforces: • *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). These mitigation effects are, by nature beneficial and assist in minimising the adverse landscape effects attributable to the temporary energy infrastructure elements. The proposed landscape mitigation could be retained after the removal of the infrastructure elements and would continue to provide a positive long-term contribution to and reinforcement of the character of the landscape, in line with the management guidelines for the area. Should the proposed landscape mitigation be considered detrimental to landscape character or views at decommissioning, then it could be removed. However, as it follows the current management guidelines this is unlikely to be recommended. With regards to the tracks and any earthworks, these too would be returned to their pervious use at decommissioning, should that be required. A restoration plan would be drawn up ahead of decommissioning which would detail these matters. The decommissioning of the NGET substation is a matter for National Grid, at the time of decommissioning. **Sensitivity** Considering the sensitivity of a landscape or visual receptor involves combining the value and susceptibility (landscape sensitivity at GLVIA3 at paragraph 5.39 and visual receptor sensitivity at GLVIA3 at paragraph 6.31). <u>Sensitivity of landscape receptors</u> No part of the Project lies within a nationally, regionally or locally designated landscape.	

Landscape receptors are both the physical landscape features, elements and characteristics, as well as the perceptual qualities of the landscape. Landscape character areas are a combination of these. GLVIA3 describes landscape character as a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse. Landscape character areas are single unique areas which are discrete geographical areas of a particular landscape type. Landscape types are areas with a relatively homogenous in physical and perceptual attributes. Therefore, taking the sensitivity of the published landscape character areas as a starting point for assessing landscape sensitivity is a valid and reasonable position.

A core principle of the Project is that existing landscape features are to be retained. The removal of hedgerows has been avoided as far as practicable (paragraph 6.4.20 of Chapter 6: Project Description **[APP-043]**). In addition, the proposed landscape mitigation follows the management guidelines for the landscape character areas. As such, the inherent characteristics and physical landscape features would be unaffected. Based on this, the overall sensitivity of the landscape receptors is evaluated as having a medium-low sensitivity to the type of development proposed.

Sensitivity of visual receptors

Visual receptors are always people.

Unless specifically referred to in the arts, the value of a view or aspects of a view is that which an individual gives to it, which varies.

Combining the susceptibility of visual receptors to the proposed development and the value attached to the view seems in practice to lower the visual sensitivity of receptors where the proposals do not align with the main direction of view. Therefore, there is potential for double-counting this with the assessment of the magnitude of change, which is also affected by the direction of view. In sensitivity emphasis is placed on the nature and activity of the visual receptor, such as recreational receptors, e.g., users of PRoWs are considered to be of high sensitivity to the proposed development.

Zone of Theoretical Visibility (ZTV)

In addition to the response to the OHAs at REP1-071 on this matter, it should be noted that ZTVs are a tool only. Generally used for identifying publicly accessible locations at which there is the potential for views of a proposed development. It is also a starting point for agreeing representative viewpoint locations with statutory consultees.

ZTVs do not factor in any landscape mitigation, or indeed future growth of existing vegetation, but illustrate the theoretical visibility of part of the Project within the existing baseline environment, based on woodland and buildings identified on the OS 1:25,000 mapping. Individual trees, hedgerows, small areas of woodland or other structures aren't shown on the OS mapping and so the screening effects of these vertical elements do not form part of the ZTVs produced.

As stated on the ZTV figures (within the legend) woodland is modelled at 12 m and buildings at 9 m. The viewer height is set at 2 m, which is higher than the average viewer's height, so in this aspect the ZTV is also an over-estimation of what would be visible, ZTVs cover areas of land from which there is no access, including areas where there is no public access, actual visibility must always be verified in the field.

Representative viewpoint locations

Based on the ZTV, candidate representative viewpoints were agreed with the OHAs, Photographs were taken from 55 viewpoint locations. Based on the available views from these locations, 33 were assessed as having potential significant effects and photomontages prepared for these viewpoints. For details of the consultation see LVIA section 8.3 **[APP-045]**.

The Cotswolds National Landscape

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.

Blenheim Park and Gardens

The solar farm is not in the World Heritage Site.

The Zone of Theoretical Visibility (ZTV) **[APP-082 to 084]** shows that there would be limited intervisibility between the solar panels and Blenheim Palace WHS.

Site visits were carried out within the palace grounds and upper floor of the palace to address this specific issue. A field of panels was removed from the Project as it was determined that it would have been partially visible, as indicated by the ZTV **[APP-082 to 084]**.

Extensive existing vegetation within and outside the palace ground, along with topographical variation, prevent view to the Project from the Blenheim Palace WHS.

It is the Applicant's position that the assessment of the landscape and visual effects on the WHS is correct.

Photography and visualisations

Regarding consultation on viewpoints, please see the Applicant's response to REP1-092X, above

Regarding methodology, please see the Applicant's response to REP1-172, **[EN010147/APP/12.4].**

It is not usual to annotate existing features on the baseline photography of the visualisations. However, should the landscape officers not be familiar with the area, this can be incorporated in any future revisions of the visualisations (such as might be required as part of any changes to the layout).

Unlike wind farms, wirelines are not usually undertaken for solar farms, as the majority of the development is screened. Could the OHAs provide an example of the use of wirelines in solar development?

Night-time effects/lighting

Approach

The Applicant has considered the potential for likely significant effects to be experienced by landscape and visual resources and receptors, from incident-related lighting of the unmanned substation, during the operations and maintenance phase at a high-level (as reported in LVIA **[APP-045]**). The Applicant found that there was no potential for likely significant effects, given the type of lighting that would be deployed (detailed by the Applicant within the LVIA **[APP-045]**) and that lighting would only be deployed during the core working hours (i.e. not overnight). Consequently, the effects of lighting at the substation were not taken forward to a full assessment. The validity of this approach is confirmed by the Landscape Institute in LITGN-2024-01: Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Assessment Third Edition (GLVIA3) ((published August 2024). At section 8(2) the Landscape Institute's GLVIA Advisory Panel explain that *"A night-time assessment should not be a routine requirement and will only be required where lighting will have a potential significant influence on landscape character and/ or visual amenity, as a result of the combination of the sensitivity of the receiving night-time environment and the nature of the proposed lighting."*

Residential Visual Amenity Assessment (RVAA)

Landscape Institute Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA) (LITGN-2/19) provides guidance on RVAAs and when they may be undertaken.

As with LVIA, RVAA is concerned with specifically with the effects of change to the views and visual amenity from individual properties. LVIA considers the effects on groups of properties (LITGN-02/19, paragraph 3.9). care should be taken not to 'double count' effects on properties (GLVIA3, paragraph 6.36).

Paragraph 1.5 of LITGN-2/19 explains that *"it is widely known that no one has 'a right to a view.' This includes situations where a residential property's outlook / visual amenity is judged to be 'significantly' affected by a proposed development."* Paragraph 1.6 explains further that *"It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. In itself this does not necessarily cause particular planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions to occur where they did not exist before.*

The Residential Visual Amenity Threshold (RVAT) has to be reached before an RVAA is required. Examples of where an RVAT is reached are where *"one might use terms such as 'overwhelming/overbearing' for tall structures, or 'overly intrusive' for a development overlooking a garden or principal room"* (LITGN-2/19.paragraph 2.2). Even with low-profile schemes, such as road and residential projects (long-term and permanent) might only require RVAA assessments for properties 50-100 m from the development (LITGN-2/19, paragraph4.7). Solar panels at a maximum height of 2.3 m are not tall structures and are not manned buildings, that overlook properties.

The effect on individual properties, raised during consultation, including public consultation events, were addressed in subsequent discussions with the property owners. Where it was agreed there was the potential for significant effects, mitigation was undertaken in the form of removal of areas of panels or additional landscape mitigation to minimise these 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.

An RVAA was not requested by the OHAs, either at Scoping or during later consultation (see consultation report, document reference **[APP-024]**).

Cumulative Effects Assessment

The cumulative schemes considered as part of the cumulative effects assessment are shown in detail on APP-116 (WODC) 117 (CDC) and 118 (VoWHDC) (figures 20.1 to 20.3) these were taken from the OHAs websites and mapped on open-source base maps.

Design of the proposals

The impacts of the Project will be minimised by a comprehensive designed-in landscape mitigation scheme. As shown on the Illustrative Masterplan [APP-062], Landscape, Ecology and Amenities Plan **[APP-228]** and Outline Landscape and Ecology Management Plan **[APP-235]**.

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 proposed planting 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. Wider green corridors are also characteristic of the existing landscape, e.g., much of Dornford Lane (PRoW 416/11/30) which passes through the middle of the northern section of the Project.
It is intended that the proposed landscape 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, at the same time improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW

corridors, views of the wider landscape and key features such as church spires, distinctive landforms (including Burleigh Wood) would remain open and available to visual receptors. The retention of proposed designed-in landscape mitigation 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 and proposed landscape mitigation takes account of and reinforces:

- *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).

Future Baseline

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, much of it within the Blenheim Estate, in areas close to the Project. Areas of these new woodlands 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.

In respect of NPS EN-1, the Applicant acknowledges paragraph 4.1.5 which sets out the need to avoid, reduce, mitigate or compensate for any adverse impacts (the mitigation hierarchy). As confirmed by paragraph 4.2.11 of NPS EN-1, Applicants must apply the mitigation hierarchy and demonstrate that it has been applied.

However, for clarity, the Applicant also reiterates that paragraphs 5.10.5 and 5.10.13 of NPS EN-1 state that:

"5.10.5 Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.

5.10.13 All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites".

This is supported by paragraph 4.2.15 of NPS EN-1 which provides that *"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts"*.

Therefore, even where residual landscape and visual impacts are present, this does not preclude the granting of consent. The national policy envisages consent being granted with such conclusions.

In any event, the Project demonstrates the application of the mitigation hierarchy in the following ways:

Avoid

- Early site visits were completed to Blenheim Palace. As part of this process, a field was identified as being visible from the palace grounds. A part of the design process this field was removed from the development in order to avoid the potential visual effects upon the WHS.
- A minimum 25 m buffer zone, from individual properties and settlements, has been incorporated into the Project. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which further limits the effects of the Project. Mitigation, as shown on the Illustrative Masterplan [AS-019] and the Landscape, Ecology and Amenities Plan [AS-022], was included to further screen available views from residential properties
- Approximately 35 hectares has been removed from the Project in order to avoid harm to identified archaeological features throughout the Project Site. In doing so, this would also have some benefit to biodiversity and potential landscape and visual effects breaking up the absolute visibility of the Project.

Name	Comment	Applicant's Response	Issues
		Reduce / Mitigate (minimise) Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [AS-019] and the Landscape, Ecology and Amenities Plan [AS-022]. (Refer to response to Point 3 above for further clarification). • Trees - In general trees are being retained wherever possible • Hedgerows –The maximum to be removed is approximately 666 m of hedgerows and non-hedgerow linear features at 80 locations. **Compensate** • Trees – The number of trees that are being planted will exceed those removed. • Hedgerows – At least 26.5 km of new species-rich hedgerow • Additional habitat creation will include: Approximately 100 ha of new Floodplain mosaic habitats along the River Evenlode Corridor At least 26 km of existing hedgerow to be reinforced through additional planting Approximately 5 ha of new native woodland creation Wildflower grasslands to be managed for wintering and breeding birds Tussocky grasslands alongside hedgerows. Hedgerow buffers will be at least 5 m wide Flood attenuation features to north of Cassington to be managed as wetland habitats Additional mixed scrub habitats alongside hedgerows A range of grasslands within the solar arrays to be managed for conservation value. 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 Requirements 6 to the draft DCO. **Changes to the extent of the solar farm** Changes have been made to the Project layout throughout the ES process as part of an iterative design. These changes have been made as a result of internal discussions and as a result of public consultation feedback received, where possible. For the example the 25 m buffer to individual residential properties and changes to the mitigation on key public rights of way to minimise the visual effects of the Project. For example, PRoW 416/5/20 in the northern section of the Project. The Applicant is cognisant of the LUC recommendations to improve the acceptability of the Project in landscape and visual terms (Appendix 1 to the Joint LIR). The Applicant requested these areas to be mapped by the OHAs in a meeting held on the 10th June 2025. Separately, there are a number of changes to the layout of the solar array, being considered due to historic environment, safety and land use/legal matters, see the Change Notification (document EN010147 Notification of Intention to Submit a Request to Change the Application (Change Request 2) These will also assist in minimising adverse effects on landscape and visual resources and receptors.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.34 The OHA consider the proposed development is not acceptable in landscape and visual terms.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.35 The LVIA is provided in revised chapter 8 of Volume 1 of the ES **[PDB-006]**. There has been very limited engagement with the OHA on landscape and visual matters and neither the methodology nor the viewpoints were agreed with all authorities in advance of the LVIA being carried out. The OHA raised concerns in relation to the methodology and the approach taken in assessing the landscape and visual impacts of the development in their responses to EIA Scoping, the PEIR, pre-submission meetings and their RR (**[RR-0164]**, **[RR-0793]**, **[RR-1086]** and **[RR-1102]**) but these appear not to have been addressed in the LVIA. There have been no landscape working groups with the applicant and engagement has been ad-hoc. Furthermore, no discussion has been undertaken with regards to the design of the scheme and its mitigation.	The Applicant consulted with all three host local planning authorities and also contacted Oxfordshire County Council on landscape and visual matters, please see the consultation report (document reference **[APP-024]**). The Adequacy of Consultation Milestone was discussed in detail with those consultees and the Applicant is committed to proactive and further engagement throughout the Examination process.	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.36 Para 8.14.4 of the ES **[PDB-006]** provides a summary of the LVIA findings. The LVIA assesses the development not to cause significant effects on the landscape character. For visual effects, it considers 12 viewpoints to be significantly affected by year 1, with 62 no significant effects anticipated by year 15 on the basis that mitigation planting will have sufficiently matured. 7.3.37 The OHA consider the ES grossly underestimates the impact of the development on local landscape character and views. This is supported by the review by LUC of the ES chapters relating to Landscape and Visual Impacts **[APP-045]**, which is provided in Appendix 1 to this LIR. 7.3.38 The review covers methodology/scope/ process, baseline information, assessment of effects, mitigation & design and visualisations. The OHA do not wish to repeat all the detail here but expect the report to be taken into account in full.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.39 The LUC report includes in paras 2.70-2.72 the following conclusions and recommendations for the LVIA: "Overall, it appears that the landscape and visual effects reported in the LVIA have been underplayed and some methodological issues are also highlighted. The lack of the above elements makes difficult to accurately and fully understand the impact and effects upon the landscape and on visual amenity. The Applicant is therefore requested to: • Revisit the methodology applied to the assessment to ensure and clarify that: the duration of the project has been correctly considered (i.e. the long-term nature of the operation phase should be considered as part of the magnitude of change). the reversibility of the project has been correctly considered (as aspects of the development such as earthworks, and the mitigation planting will not be reversible). Confirmation is also required as to what will happen to the substations and access tracks beyond the operational phase. detailed information regarding the production of the ZTVs is provided (including how the heights of existing buildings and vegetation have been derived), and to provide clarity as to if a worst case 'bare earth' ZTV has been included or not. the geographical extent, duration and reversibility has been correctly considered for the visual assessment for the representative viewpoints. the assessment of cumulative effects considers the full scenario; whereby multiple projects may co-exist in the landscape.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.39 • Revisit the threshold of significance which currently considers effects of Moderate or less to not be significant (given the definition provided for a medium magnitude of effect sounds like a significant effect). • Provide an updated assessment as currently the significance of effects appears to have been downplayed. Provide an assessment that considers the effects of lighting, including temporary lighting during construction, or stronger justification as to why this has been scoped out. • Provide confirmation that the exclusion of the Residential Visual Amenity Assessment (RVAA) was agreed with relevant consultation bodies, and clarity regarding the justification for scoping it, out as the current reasoning appears flawed. The proposed 25m offset for properties, settlements and communities requires consideration on a case by case basis, so that aspects such as topography and vegetation are fully considered. A standard 'buffer' approach is unlikely to be sufficient in terms of mitigation of significant effects at all locations. • Revisit the approach to assessing and describing the landscape and visual effects at year 15 ensuring that the worst-case scenario (i.e. winter) has been assessed. • Provide clarification as to how the judgements (and their definitions) of susceptibility and value correspond to sensitivity by revisiting Tables 8.9 and 8.10. • Revisit and expand the criteria used for landscape susceptibility to clearly set out the characteristics of the landscape which are being considered to determine its susceptibility. • Revisit and expand the criteria used for visual susceptibility to ensure that consideration has been given to local communities, and that they have been appropriately assessed. The LVIA does not state why local communities have	The Applicant notes the OHAs concerns. Methodology (including sensitivity, impact magnitude and significance of effects) - please see the Applicant's response above. Night-time effects – please see the Applicant's response above. RVAA – please see the Applicant's response above Landscape baseline – see the Applicant's response above. Effects on the Cotswolds National Landscape – please see the Applicant's response above. Effects on visitors to Blenheim Palace WHS – please see Applicant's response above. Landscape mitigation – please see the Applicant's response above. Inconsistencies – apparent inconsistences and corrections have been responded to in the Applicant's response to the Rule 17 letter. Tree and hedgerows – please see the Applicant's response above for how trees have been and will be considered in the master plan. Additional information on the consideration of trees within the ongoing detailed design is provided below. The submitted strategic arboricultural impact and method statement adopts a precautionary approach to determining root protection areas (RPA) and also it provides the methods which should be employed when working near to trees. As a "tree-protection-manual", knowledge of every precise tree stem diameter and associated RPA is not required to provide the safe retention of trees as part of the development. The precise alignment of cables within cable route corridors is not yet known. These would be subject to a wide range of detailed design inputs. The current arboricultural reports consider a	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
	been scoped out, and given the scale of the Proposed Development and the number of settlements surrounding the Site, the apparent exclusion of local communities is considered to be an omission. • Revisit the judgements regarding landscape and visual sensitivity (Tables 8.15 and 8.17 respectively) to provide justification as to how each sensitivity rating has been reached, in terms of the contribution of judgements on susceptibility and value. • Provide a clear summary of the landscape character and landscape features of the Site, and show how the descriptions from the various published landscape character assessments, GI Strategy etc have informed the proposed landscape and visual related mitigation / design. Set out clearly the lengths and areas of vegetation to be lost (including numbers and quality of trees), as well as the lengths of new hedgerows /numbers of new trees etc. Consider the planting of copses of woodland to help reduce effects, where appropriate to landscape character. • Provide further information relating to the sensitivity of the Site, which appears to be missing. • Revisit the judgement of sensitivity relating to the Cotswolds National Landscape (Table 8.16) and consider the national landscape as having a 'very high' sensitivity, or provide justification as to why it has been judged to have the same level of sensitivity (high) as users of public rights of way and access land. • Provide an assessment that considers the visual effects on visitors to Blenheim Palace Park and Gardens, or justification as to why this has been scoped out. • Revisit the assessment of landscape effects during construction and operation on the Project Site and the host LCA/LCTs, as effects have been understated as it is considered that locally significant effects on landscape character are inevitable given the extensive change in land use across a site of this scale. • Revisit the approach taken to assessing and describing the effects on landscape character – drilling down to the character area level, rather than expressing impacts at the level of the 'LCA as a whole' and providing greater spatial specificity as to where impacts will be concentrated, how this will vary spatially and how this could/should shape design. • It is anticipated that this information will provide important context to inform judgements on where design changes may be required. • Revisit the assessment of landscape and visual effects on the Cotswolds National Landscape as effects appear to have been understated, and provide a representative viewpoint from it (e.g. from Wychwood Way walking trail at Combe), so that the effects on the National Landscape can be fully understood. • Revisit the assessment of visual effects on PRoWs as there are several inconsistencies with the methodology as noted in this review. Ensure sequential effects on users are fully considered, noting the nature and frequency of views (in summer and winter conditions). • Revisit viewpoint assessments where the levels of effect have been reduced between years 1 and 15, but where the proposed planting will not provide any screening. • Provide or refer to a mapped figure illustrating the locations of the schemes considered in the cumulative assessment. • Provide the Examining Authority and relevant parties with further information on how landscape and visual matters have informed landscape mitigation proposals. • Re-consider the appropriateness of the proposed mitigation measures where new planting will completely change the nature and openness of the view, and the experience afforded to users of PRoWs. In particular, consider the nature of the planting, its proposed height and the way it is to be managed (traditional techniques such as laying should be employed).	wider corridor, and the potential impacts of this wider corridor; therefore, guiding future designs, allowing arboricultural elements to be part of the detailed design constraint inputs.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.41 In addition to the above, the OHA wish to expand on the following topics of concern and disagreement based on their previous comments to the PEIR and RR, and the LUC review, as there are fundamental concerns about this NSIP application with regards to the LVIA assessment and how this has informed the design and layout of the solar scheme. Concerns	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
	are not just about the assessment methodology, but whether the level of assessment has been undertaken at a scale appropriate to inform the development of the Botley West scheme.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.42 The OHA are concerned about how significance levels are being set in the methodology and how they are applied in the assessment. This issue of what is considered 'Significant' is covered in both the LUC response Appendix 1 and in the OHAs' previous responses.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.43 Concerns also relate to the significance of impacts being based on spot receptors rather than looking at the project more holistically. PRoW routes are an example for this, paragraph 8.5.22 **[PDB-006]** states "For the purpose of this assessment, any effects with a significance level of Moderate or less are not considered to be significant in terms of the EIA Regulations." 7.3.44 However, the OHA consider this approach to be too simplistic, setting the bar too high in terms of the significance thresholds. The OHA are also of the view that impacts should be considered significant when the assessment results in multiple negative effects, such as on connecting PRoW routes. Assessment of an effect should not be looked at in isolation and discarded as not significant but viewed holistically as part of the whole picture and reflect the impact of the receptors journey through the landscape along the PRoW. 7.3.45 The appropriateness of this is recognised in the last row of table 8.6 (Summary of consultation relevant to this chapter) on page 24 of Chapter 8, where it states 'Assessment considers effects from individual Representative Viewpoints. But it is acknowledged within the LVIA that effects may be present along length of the PRoW or roads for example.' The LVIA states in section 8.9.125 of: 'However, where Moderate significance of effect has been identified at multiple points along the same PRoW, sequentially these Moderate adverse effects could be considered significant.' This is recognised in relation to viewpoints 37, 38 and 39 but is not picked up elsewhere in the LVIA, and the OHAs therefore do not consider that the landscape and visual impact of the development including the PRoW network is adequately covered in the LVIA.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.47 The assessment downplays the long-term nature of the project by classing the Operation and Maintenance phase as 'temporary'. Whilst technically speaking, a 40-year lifespan is temporary, (as explained in paragraph 7.3.49) not all works will be temporary. The long-term nature of the operation phase should be considered as part of the magnitude of change, and this does not seem to have been the case throughout the assessment. 7.3.48 It should be noted that a recent decision on a solar development in the Greenbelt concluded that 40 years should not be judged as "temporary" (APP/A1910/W/23/3317818 Little Heath Lane, Little Heath, Berkhamstead).	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.49 Paragraphs 8.5.9 and 8.5.11 of the ES both state 'For the purposes of this assessment the Project is considered to be fully reversible', and this has an influence on the assessment values. However, this statement is incorrect as aspects of the development such as earthworks, and the mitigation planting (which forms part of the Proposed Development) will not be fully reversible. For example, it is not clear what will happen to the access tracks, the electrical connection to the grid and whether all structures will be removed. The applicant has confirmed in the first Issue Specific Hearing (ISH1) on 15th May that mitigation planting such as hedgerows is proposed to remain in place. Whilst this might be appropriate in some locations, it has the potential to also result in permanent changes to the local landscape character and views.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.50 The OHA also have concerns about how 'reversibility' is being applied to the assessment of effects. i.e. paragraph 8.9.119 states "The magnitude of impact, for those parts of the PRoW where views are available, would be Medium, resulting in a Moderate adverse significance of effect. Considering users' High sensitivity, reversibility of the solar farm and proposed mitigation, albeit not yet having matured and reached its' intended design function. This effect is not significant." High sensitivity, medium impact would give a Moderate to Major adverse significance, which is significant under EIA assessment. This significance should not be reduced because the Applicant considers the solar farm "reversible"	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.53 The Applicant is therefore requested to: • Revisit the methodology applied to ensure all information as advocated by the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals is provided and provide clear justification as to why photography was taken at a height of approximately 1.7m instead of the recommended 1.5m. • Ensure that the full field of view occupied by the Proposed Development is shown in visualisations where this is exceeds 90 degrees.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
	• Re-consider the single frame visualisations used where they have been selected to demonstrate the point of least visual impact. • Ensure that the height of proposed planting has been accurately represented in visualisations, and that alongside proposed fencing, has been modelled correctly. • Re-consider the accuracy of the visualisations noted as concern within this review."		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.54 In addition to the above LUC comments, the OHA have remaining concerns about the visualisation that were not addressed in the LVIA. The OHA consider the representative photographs do not meet the requirements of the Landscape Institute's technical guidance note on visualisations (TGN-06-19: Visual Representation of Development proposals), which requires as a minimum that the location of the development is identified in the views (Type 1 visualisations).	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.55 ES Volume 3 Appendix 8.4: Photomontage Methodology **[APP-149]** 1.1.1 refers to the methodology used for annotated photographs, photomontages or photo wireline, but predominately only covers the photomontages. Due to the scale and public interest of the project, the OHA requested at PEIR stage that all viewpoint plans be annotated. Annotations should include key features and have wirelines to highlight the location and extent of areas of the proposed solar arrays (but not necessarily full modelling of the arrays), so that the extent of the scheme can be easily understood by all. A map extract to indicate the location of the view would also useful and is recommended by Landscape Institute guidance TGN-06-19.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.56 The LVIA information is not easily accessible, and it would be helpful to have a plan that includes the Masterplan Layout, Viewpoint locations and the PRoW clearly marked and numbered, to help with the understanding of the submitted visualisations	Figures showing the ZTV, the labelled PRoW and the viewpoints on 1:50,000 OS mapping are provided with this response (appended as Figures 12.3.1 to 12.3.3 of this document).	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.57 The OHA (as explained in paragraph 7.3.51) expressed concerns that some viewpoints and visualisations did not cover the whole extents of the view of the solar farm from a specific viewpoint, for example in relation to viewpoints VP48 and VP45. Views from VP5 are presented in three views, 5a, 5b and 5c, covering different viewing directions. This approach should also be provided for other viewpoints such as VP48 where the scheme covers areas to the East and West of the northern viewpoint included in the ES. This request was not satisfactory addressed in the LVIA.	The Applicant notes the OHAs' concerns. Due to the Change Request outlined in the Change Notification (Document ref EN010147 Notification of Intention to Submit a Request to Change the Application (Change Request 2) the extent of the visualisations will be reviewed and where relevant revised and reissued. Considering Representative Viewpoint 48 specifically, a 180° panorama was taken during site visits capturing the areas covered by the Projects' southern section. To the east of this viewpoint is a mature hedgerow, visible within the viewpoint photographs **[APP-065 and 066]**. As such, there is limited or no possible visibility to the Project to the east of Representative Viewpoint 48, which is why it has been orientated more to the southwest. Visualisations have been done in accordance with best practice guidance (Landscape Institute_ Technical Guidance Note- –06/019 Visual Representation of Development Proposals (LITGN 06/19). This guidance gives specific measurements for the display of images (please refer to Applicant's response to REP1-172 **[EN010147/APP/12.4]** for further detail), therefore it is not possible to show the full extents of the view of the Project in relation to a specific viewpoint, such as those referred to in REP1-072.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Viewpoints 7.3.58 Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3) expects the LVIA to identify people within the area who will be affected by the changes in views and visual amenity. The OHAs raised concerns (both in the Scoping and PEIR) about the limited range and number of viewpoints, such as limited coverage of the wider footpath network to the North and East of the site. 7.3.59 For comparison, withdrawn planning application (VWHDC ref: P23/V2624/FUL) for Red House solar farm (a similar scale to, and adjoining, the Southern Site of Botley West and now resubmitted under reference P24/V2489/FUL) used 30 different photo locations covering 13 different routes in its assessment report. In contrast, Botley West uses 12 to cover the southern extents of the application with 5 visualisations. The OHA consider this not to be comprehensive enough for the scale of proposed development and to sufficiently cover views from the PRoW network. There are numerous places where views have not been taken, including those highlighted in the Cumnor Neighbourhood Plan such as Viewpoint 5b, 12, 23, 7, 12 and 17. 7.3.60 The LVIA for the proposed development only uses 55 viewpoints despite it being approximately 17 times greater than the Red House application, and consisting of three different areas of solar, the grid connection area and the cable routes. This indicates that the assessment has not been undertaken at a scale that is proportional to that of the proposal. 7.3.61 There was no change in the number of viewpoints between the PIER assessment, the Scoping and the LVIA. The ZTV for the proposed buildings and associated infrastructure was	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
	only provided at LVIA stage to inform the number of viewpoints, but this has not led to an adjustment in the number of viewpoints to consider the wider ZTV. 7.3.62 The LVIA does also not include any viewpoints in areas where cabling is proposed on the basis that effects are limited to the construction phase, however, with the level of impact and duration not being clear, the OHA suggest that assessments from selected viewpoints are included to demonstrate the level of impact of these measures, e.g. a view from the Thames Path near Swinford Bridge. 7.3.63 The OHA also highlighted in previous comments **[RR-0793 (para 3.2) and [RR-1086]** (page 19) that the impact of mitigation measures on views and landscape character needs to be considered in the LVIA assessment. Many available views are large-scale over the wider landscape, whereby screening a view so that solar panels or other development cannot be seen also has an impact as the landscape-scale view is no longer obtainable. This potential impact of mitigation should be covered and factored into the assessment of views. The OHA do not consider there has been assessment in the EIA on how mitigation will impact on the ability to enjoy the changing views of the landscape especially from the PRoW network as per EN-3 (para 3.10.28).		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Landscape Baseline and Assessment 7.3.66 While the baseline work in the LVIA covers the hierarchy of published Landscape Assessments (although not Neighbourhood Plans LCAs), no site-specific landscape character assessment has been prepared and there is no reference to what features from the existing assessments are present in the site and where they are located on site. 7.3.67 The Key Characteristics of the published Landscape Character Assessment Types and Areas are detailed in Appendix 8.1 of the ES **[APP-143]** however this assessment looks unfinished. The text for each section starts with similar sentences for example 1.3.30 'The Vale Farmland LT covers part of the Project Site (fields x) in the south of the Study Area and the key characteristic features relevant to the Application Site and the surrounding areas are summarised as:' 7.3.68 It is difficult to see where the Baseline assessment of the site is presented in the LVIA **[PDB-006]**, as per section 5.33 of GLVIA3 to identify and record the different characters of the landscape, and the elements, features and aesthetic and perceptual factors which contribute to it. The only reference the OHA could see is contained in paragraphs 8.6.33 and 8.6.34. 7.3.69 It is unclear how landscape effects have been predicted and described in the LVIA if there is no clear baseline information to base these effects on. Without this level of baseline information, it is not clear how the GLIVA methodology has been followed.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.71 The OHA have found it difficult to follow the assessment with regards to landscape effects on the project site and have concerns about the reported 'overall magnitude of Low, with minor adverse significance effect, which is not significant'	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.72 The OHA have similar concerns with how the assessment of effects on the LCAs have been undertaken, including the statement 'When considering the scale of the development relative to the LCA as a whole, there would be remain a magnitude of impact of Low, with a Minor adverse significance of effect, which is not significant.' 7.3.73 Many of the key characteristics that contribute to the LCA, such as the lack of development in the landscape and open views would be lost or impacted within the site and in the wider surrounding landscape. The development would fundamentally change the character of sections of the LCAs.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.76 The LVIA does not clearly describe how the design of the scheme was created with regards to minimising the potential impact on the landscape (or visual) effects. As covered in VWHDC RR **[RR-1086 pages 14 –16]** there has been little evolution of the scheme between the initial consultation on the PEIR and the submitted NSIP, and limited information within the NSIP to explain changes to the scheme and associated Masterplan. The OHA can only assume this might be due to fact that the LVIA assessment predominately assesses the Landscape Effects and Visual Effects as not significant, and therefore the applicant did not see a need to develop the Masterplan to further reduce Landscape and Visual effects.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.78 It further requires applicants to demonstrate in their application documents "… how the design process was conducted and how the proposed design evolved. Where different designs were considered, applicants should set out the reasons why the favoured choice has been selected."	The Applicant notes the OHAs' concerns - please see the Applicant's response, above (REP1-072).	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.79 It is unclear how findings in the ES including the LVIA have informed the siting, scale and design of the project as required by EN-1. Chapter 5 (alternative options) seems to suggest that the site location was primarily chosen based on land availability (willing landowners) and availability of a grid connection. Whilst the importance of these factors is	The Applicant notes the OHAs' concerns – on landscape and visual matters, please see the Applicant's response, above. Other matters are considered by the topic specialists.	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
	understood, it is not clear how environmental factors have informed the layout and design, e.g. how considerations relating to landscape character, topography, views, ecology surveys, heritage, historic landscape character or agricultural land classifications have been considered. The only environmental issues that appear to have been included are designated sites and archaeological areas.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.81 However, there has been very limited change in the proposed Masterplan during the process. The site layout was indicated in the Phase One consultation documents, the Botley West Solar Farm Concept Plan and the Phase One Community Consultation Leaflet, November 2022. The overall layout proposed in the EIA is still very similar. 7.3.82 It is also noted that most site fieldwork and reports were undertaken after the publication of the concept plan. LVIA field work started in Winter 2022, Archaeology Geo-physical work took place between March 2023 and August 2024, PRoW surveys were conducted between May and August 2024, and Soils were considered between 2023 and 2024. While there have been changes to the Masterplan, these have been very much constraint-driven, such as the removal of Areas of Archaeological Interest and adding standard offsets. There is little evidence that the Masterplan has been revisited for a sense-check (especially after areas of constraints have been removed) or that the Masterplan has been looked at in any detail in how it could be changed to reduce the impact of the proposed scheme. 7.3.83 There is further concern about the LVIA work and how this underplays the impacts of C74the scheme. Without taking these concerns into account, the OHAs are unsure of how the LVIA work has been used to inform the scheme Masterplan, especially for location of solar arrays. There has been little adjustment to the layout of solar arrays in reference to where impacts including significant impacts have been found to reduce Landscape and Visual effects. 7.3.84 This issue was touched on in VWHDC's response to the PEIR where it indicated that 'the layout of the scheme does not indicate that there has been much modification to the design of the scheme to minimise impacts in response to receptors and constraints. For example, small areas of solar panels within the southwestern area of the site either side of the footpath and adjacent to the ancient woodland are retained rather than a broader look at the project at a landscape and project scale to see if it would be more appropriate not to include these small areas of solar. Again, small areas of solar arrays are formed once servicing constraints are added south of Denman's Farm. It may be more appropriate due to the proximity to the PRoW and the residential property not to have these small areas under solar panels.' There does not seem to have been a review of the masterplan in response to these comments.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.87 Section 8.9.162 of the EIA **[PDB-006]** covers representative Viewpoint 8: View looking southeast from footpath 416/24/10, near Hordley House. It states a part of the northern site would be visible on top of the pronounced ridgeline across the view. Solar panels would appear as a single row over the ridge. However, the viewpoint description does not describe the impact on the rest of the footpath as it passes through the middle of the solar panels.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.88 Section 8.9.168 **[PDB-006]** Representative Viewpoint 11: View looking west from bridleway 379/10/20 (Clause Duval Way). The LVIA states that solar panels would occupy rising ground to a ridgetop in the middle view. The OHA queries whether the assessment of the viewpoint is correct. If it is a high sensitivity user with a noticeable change, then the impact would be higher than Moderate and would be Significant.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.90 The Masterplan therefore needs to be revisited and revised to reduce the impact of the scheme in numerous areas, including other areas with similar concerns with regards to locations of solar panels such as Bladon, Worton Heath, the Priory Area east of Begbroke, east of Pinsley Wood, south of Church Hanborough, north of Cassington / Yarnton Road and east and west of Cumnor Road	The Applicant notes the OHAs' concerns. Due to the Change Request outlined in the Change Notification (Document ref EN010147 Notification of Intention to Submit a Request to Change the Application (Change Request 2) the visualisations will be reviewed, where relevant they will be revised and reissued.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Denman's Farm 7.3.96 Furthermore, the emerging evidence base of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 includes suitable broad locations for renewable energy schemes, including ground-mounted solar on the Emerging Policies Map and under the CEQ Climate and Environmental Quality Evidence Base. It does not, however, indicate capacity for solar development within the proposed development Southern Site area. VWHDC therefore request the Masterplan is revised to remove all solar from its area.	The South Oxfordshire and Vale of the White Horse Renewable Energy Study: Landscape Sensitivity Assessment (LUC for SoDC and VoWHDC) was published in September 2024. The study reports on the sensitivity of different landscape types to different wind and solar development. The Application site lies within Landscape Type 14A, a river valley landscape. Which, according to the report has a High sensitivity to the size of solar farm proposed. The report notes that Farmoor Reservoir dominates the landscape. Elements that increase sensitivity are	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
		its visibility from surrounding higher ground and from public rights of way. Also, the landscape area reads as part of a continuous landscape rising to the valley edge to the south. The study provides an overview of an entire landscape area, not a detailed analysis. Not all the land within the landscape area will have the same sensitivity. This area is already significantly influenced by human activity. In its review of the solar farm, i.e. with a site-specific proposal, incorporating landscape and other environmental mitigation proposals and enhancements, LUC does not recommend the removal of all areas of solar panels within the southern (VoWHDC) site, rather it recommends the removal of areas of solar panels to the west of the Cumnor Road *"Remove the small, fragmented areas of PV array to the west of Cumnor Road (illustrated on Figure 2.3 – Southern Site Area), particularly those to the north/north-west of Smith Hill Copse. Removing panels in this area would increase the offset with the woodland and will make the layout more compact, whilst reducing effects upon the users of the PRoW that cuts through the area (which would otherwise have PV panels on both sides of it)."* (Joint LIR Report, Appendix 1, paragraph 2.67, May 2025).	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Constraints & Opportunities Plan 7.3.98 The chapter covers the importance of undertaking a contextual analysis, which looks beyond the red line of the application site to create a Constraints and Opportunities plan for a development, (Landscape Figure 2). This can then be developed into a design rationale (Landscape Figure 3), which uses the site's features and context to shape the design. The OHA suggest that a Constraints and Opportunities plan is prepared outlining landscape and visual sensitivities to inform and shape the design and mitigation, as this is not covered in the submitted Landscape Resources Plan **[APP-081]**	The Applicant notes the OHAs' concerns. Due to the Change Request outlined in the Change Notification (Document ref EN010147 Notification of Intention to Submit a Request to Change the Application (Change Request 2)) the extent of the solar panels will change.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Project Elements and Design 7.3.99 Information on the project elements and design have been provided in Chapter 6 Project Description **[APP-043]** but questions regarding appearance, design and impact remain. The following paragraphs provide some examples: • EN-3 (paras 3.10.32 & 3.10.90) requires the impacts of security measures such as fencing and lighting to be assessed and minimised. The ES provides insufficient detail of fencing and lighting, but it is assumed that different types of fencing are required such as security fencing around buildings compared to the proposed deer fencing for the wider scheme. Further detail on these design choices should be provided, and their impacts assessed. ' Limited information has been provided about the use and impact of lighting during the construction and decommissioning phase including the movement of vehicles and the effect of this on Landscape Character and Visual Amenity	The Applicant notes the OHA's concerns The details of the Project are provided in ES chapter 6: Project Description **[APP-043]**). Please see the Applicant's response to the approach to night-time effects/lighting above.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.99 • The development seeks to connect to the grid, which requires additional infrastructure including an additional substation that is not part of this application. This is recognised, but it is important that the impacts of all elements related to this development are assessed comprehensively to understand the landscape and visual impact of the development on the area and potential cumulative impacts.	The LVIA **[APP-045]** has assessed the Project as a whole rather than specifically assessing individual elements separately, as one part of the Project would not be constructed without the other parts. The ZTV **[APP-082 to 084]** illustrate all built elements, including the substation(s) etc. and these elements are captured within the visualisation from a number of Representative Viewpoints, including an indicative outline of the NGET substation. Such as Representative Viewpoint 50 **[APP-080, Figure 8.362]**,	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.99 There is concern relating to the uncertainty of the requirements for the grid connections. This is a large and major component of the application, and the expected infrastructure and grid connections associated with the project should be included to allow the cumulative impacts of the structures to be assessed. Information provided about the appearance of the grid connection is limited, but these are often very industrial in appearance. It is also noted from other recent solar applications in Oxfordshire, that Battery Energy Storage Systems (BESS) are often included or followed closely after, such as southwest of Cowley Substation, Nuneham Courtenay, Oxford, OX44 9PA. If battery storage is expected to be associated with this project, the cumulative impacts of this should also be covered in the ES, especially due to its greenfield, rural and greenbelt location.	The details of the Project that the Applicant is seeking a DCO for is provided in ES chapter 6: Project Description **[APP-043]** and the draft DCO. No other development is being applied for.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.99 Four main temporary construction compounds are being proposed across the area. The appearance of the compound areas is not explained in detail, but they are large (approximately 100x100m and 100x200m) and will comprise structures and material storage secured by fencing, lighting and CCTV. The project description states (**[APP-043]** para 6.3.4) that these compounds are proposed to remain in place after construction albeit being taken over by solar panels. It is therefore important to understand their appearance and related impacts.	The LVIA **[APP-045]** has considered the effects of the Project at construction, operation and decommissioning.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.100 Project design is particularly relevant as the Temporary Facilities Plans **[APP-229]** suggest that the majority of the temporary construction compounds are placed in highly visible locations. For example, the southern compound appears to be sited on a slope and thus is	Landscape mitigation, by its nature is of a longer term than the short-term nature of the construction compounds and work, It is considered that hoarding (for visual mitigation) would be more visually adverse than the view of the plant and storage of panels, etc. within the	Landscape and Visual Impacts

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	likely to require levelling of the land, which in turn is likely to increase its impact in landscape character and views. It is unclear whether and how this has been fully assessed in the LVIA and how the findings have informed the siting and design of the compounds. 7.3.101 EN-1 paragraph 4.7.7 requires projects to be designed carefully taking account of the potential impact on the landscape. Further detail on the siting, design and impact of each of the compounds should be provided.	compounds. It may be possible to arrange spoil heaps/storage areas within the compound areas in such a way as to assist in screening the plant within the construction compounds	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.102 Information on cable laying methods (**[APP-130]** appendix 6.2: cable laying methodology and indicative HDD crossing locations) has been provided, but the impact of this method on the locations is still insufficiently clear. The safeguarded areas are of large extent in places and limited information has been provided about the compounds on either end of the drilling holes. The OHA are concerned that these could adversely affect local character and views, for example through the loss of mature vegetation. The entrance and exit hole compounds are shown on the plan, but with the burial depth varying between 1.5m to 30m (para 6.3.11), it is not clear how the location of the compound has been determined at this stage. It is also unclear whether any ancillary structures such as cabinets or fencing will remain after construction.	The details of the cable laying methodology **[APP-130]**, including the HDD compound design treatment and depth of cables, will be progressed through the advancement of the Code of Construction Practice, in line with the outline Code of Construction Practice **[APP-232 & APP-233]**, and for construction compounds more generally, including details regarding their removal.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.103 Further information should also be provided on decommissioning, i.e. what exactly it will entail and what mitigation planting and land use changes introduced as part of the development will remain in place to deliver long-term landscape benefits. EN-3 states to this respect: "Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation."(para 2.10.69). 7.3.104 Further information should include details on the removal of the piling to better understand any potential impact of this might have on landscape character and views.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above, for details of the potential beneficial effects of retaining vegetation at decommissioning. The details of the Project that the Applicant is seeking a DCO for is provided in ES chapter 6: Project Description **[APP-043]** At decommissioning the ends of the cable will be cut and the cables pulled through the sleeve, via the link boxes. The cable sleeves will not be removed.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.105 Mitigation measures are listed in the LVIA **[PDB-006]** (table 8.20), the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. Mitigation comprises hedgerow reinforcement and planting, meadow grasslands, planting of individual trees and of woodland blocks, but it does not include substantial changes of the extent or layout of the development. There are no obvious differences in the layout between the Illustrative Masterplan in the PEIR and the current Masterplan except the addition of the archaeological areas. 7.3.106 As already outlined above, the LVIA does not explain how information from the local landscape character assessments apply to the site, and it is therefore not clear how mitigation measures have been chosen for each location. Whilst many of the suggested measures are appropriate in general terms, it is important that the right measure is chosen for the right place to ensure that mitigation is in keeping with the local character. In some places the proposed planting of trees or hedgerows can adversely affect landscape character and views. For example, the photomontage for VP 23 and 54 shows how the proposed planting will fundamentally change the character of the view from open to enclosed, adversely affecting the experience of the PRoW users. Mitigation in other locations is likely to have a similar effect on the landscape and users of public rights of way (PRoW). 7.3.107 The effects on PRoWs are of particular concern as they are an important recreational resource for existing and future residents from within and outside the area.	The Applicant notes the OHAs' concerns. Due to the Change Request outlined in the Change Notification (Document ref EN010147 Notification of Intention to Submit a Request to Change the Application (Change Request 2)) the extent of the solar panels will change. Please see the Applicant's response above, which details the Applicant's approach to baseline landscape character and the character of the views available to people. Please refer to the Applicant's response to REP1-114 in **[EN010147/APP/12.5]** and REP1-141 in **[EN010147/APP/12.4]** for response regarding public rights of way and landscape character effects post decommissioning.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.108 It is important that the impact of mitigation measures on views and landscape character is also considered in the LVIA assessment. Many available views are large scale over the wider landscape and screening a view so that solar panels or other development cannot be seen can also have an adverse effect, as the landscape-scale view is no longer obtainable. This potential impact of mitigation should be covered and factored into the assessment of views. The OHAs currently do not see that there has been assessment on how mitigation to prevent seeing the solar panels, impacts on the ability to enjoy the changing views of the landscape within the EIA. 7.3.109 The development will by its scale and nature adversely affect the experience of public rights of way users travelling through the area. In many locations PRoW users will either travel through large areas of solar infrastructure or walk through corridors of hedgerows or tree belts with no or limited views of the surrounding landscape. 7.3.110 The OHAs raised numerous concerns in relation to the visual assessments in their comments on the PEIR and in their RRs (**[RR-0164]**, **[RR-0793]**, **[RR-1086]** and **[RR-1102]**). It is likely that the LVIA is underestimating the impacts on several PRoWs, partly because it insufficiently recognises the length of PRoWs affected and by overestimating the effectiveness of mitigation planting.	The Applicant notes the OHAs' concerns - please see the Applicant's response, above. 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 and Visual Impacts

Name	Comment	Applicant's Response	Issues
	7.3.111 Other measures to reduce impacts on PROWs such as by removing areas of solar panels where, in several locations, impacts are then limited to only one side of the PRoW rather than both sides (e.g. near 8, 16, 21-23, 33, 51) should also be adopted.	landscape, such as much of Dornford Lane (PRoW 416/11/30) which oases through the middle f 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 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.	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.113 The OHAs consider the proposed mitigation does not match the scale and impact of the development. As outlined in OCC's comments on the PEIR, councils encourage a landscape-scale approach to be adopted, that offers a more holistic approach to mitigation that matches the scale of the development, e.g. by creating substantial links between habitats and woodlands, maximising benefits for biodiversity and infrastructure (informed by the ecological survey information and the emerging Local Nature Recovery Strategy) and maximising opportunities to expand and improve the PRoW network. 7.3.114 Considering the scale of the development, the OHAs would like to see a more ambitious approach to mitigation that is informed by LVIA work and which goes beyond planting linear features that screen the development from particular viewpoints, but which delivers real benefits for nature and people, and enhances the local landscape character. 7.3.115 The OHAs consider it important that, in line with the mitigation hierarchy, adverse effects on landscape character and views are avoided in the first instance, e.g. by avoiding sensitive slopes, before considering mitigation.	The Applicant continues to liaise with relevant stakeholders regarding PRoW and active travel routes as part of the Project. The ecological benefits of the landscape mitigation are considered in ES Chapter 9 Ecology and Biodiversity; for example, with respect to hedgerow planting and the benefit of this to receptors such as dormice. The landscape scale of the Project and the need to ensure benefits associated with the Project were commensurate with this, was recognised by the Applicant at an early stage of the development design. As set out in section 7 of the oLEMP, the ecology strategy for the Project has been developed with the aim of ensuring that appropriate landscape-scale ecological benefits were realised. The main component of this is the Evenlode Corridor but linkages across the Project site will also be created to enhance connectivity between the blocks of ancient woodland. At the time the Project was being designed, the Oxfordshire Local Nature Recovery Strategy (LNRS) was not available, but the Oxfordshire Nature Recovery Network (ONRN) was used to ensure alignment between the Project and the county-level strategic ecology goals. The resulting alignment of the Project with the emerging LNRS has been acknowledged by the Host Authorities (section 7.4.69 of the LIR **[REP1-072]**). The Landscape proposals are illustrated on the Illustrative Masterplan **[APP-062]** and described in the LVIA **[APP-045]**. As described in the Applicant's response, above, the landscape proposals are in keeping with the management guidelines for the character areas within which the Project is located. The Applicant notes the OHAs' concerns regarding the layout of the solar panels. Due to the Change Request outlined in the Change Notification (Document ref. EN010147 Notification of Intention to Submit a Request to Change the Application (Change Request 2)) the extent of the solar panels will change. The Applicant believes that the masterplan delivers beneficial improvements in terms of the PRoW network, ecology and landscape character. Please refer to the Applicant's response to REP1-114 in **[EN010147/APP/12.5]** and REP1-141 in **[EN010147/APP/12.4]** for response regarding public rights of way and landscape character.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.116 Adverse effects on residential areas and heritage areas and their setting are also of concern. As outlined in the LUC report in Appendix 1 there appears to be no consideration of local communities as a visual receptor despite the ZTV indicating theoretical visibility from the edge of settlements within the study area (e.g. Wootton, Woodstock, Kidlington, Long Hanborough, Cassington, Freeland, Eynsham, Bladon, Farmoor and Cumnor). EN-3 states in	The effect on historic assets and their settings are considered in ES Chapter 7: Historic Environment **[APP-044]**. Please see the Aplicant's response above regarding RVAA (REP1-072). Where individual residential properties or towns / villages have been identified as sensitive receptors, but not necessarily covered by a specific receptor group, Representative Viewpoints have been taken	Landscape and Visual Impacts

Name	Comment	Applicant's Response	Issues
	paragraph 3.10.88 that applicants should carry out landscape and visual assessment and that visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas of viewpoints. The LVIA does not state why these have been scoped out and, given the scale of the Proposed Development and the number of settlements surrounding the Site, the exclusion of local communities is an erroneous omission. 7.3.117 This is particularly relevant as the LVIA also scopes out the need for a Residential Visual Amenity Assessment (RVAA) despite this being requested by the Inspectorate in the Scoping consultation. LUC questions the applicant's approach and justification for not carrying out a RVAA in their review in Appendix 1 paragraphs 2.41-2.42. The impact on settlements and their communities are therefore not considered to be adequately considered in the LVIA.	from publicly accessible locations as close to the receptors to be representative of those views available. Such as, at the edge of Cassington (Representative Viewpoints 40 and 41 **[APP-065 and 066]**) and at the northern edge of Begbroke (Representative Viewpoint 32 **[APP-065 and 066]**)	
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.118 The DCO application (**[PDB-006]** page 15) proposes a standard minimum buffer of 25m to adjacent residential areas, however, this distance does not appear to be informed by any assessment work, and the justification for this approach is not clear. The OHA consider this approach too simplistic and believe that the distance and treatment of buffers should be determined on a site-by-site basis and informed by assessment work.	Extensive fieldwork was undertaken during the development of the master plan. The findings from the fieldwork and from other desk-based sources, including from other topic specialists, were used inform the landscape proposals, as part of the overarching master plan. A reasonable buffer to residential properties was applied initially, with variations to that initial distance being dealt with on a case by case basis. Professional judgement was used to determine a minimum 25 m buffer zone, from individual properties and settlements, has been incorporated into the Project. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which would further limit the effects of the Project. Additional mitigation, as shown on the Illustrative Masterplan **[APP_062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**, was included to further screen available views from residential properties. The impact of Glint and Glare upon residential amenity has been assessed within the Solar Photovoltaic Glint and Glare Study **[APP-128]** (Section 7.4). The 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. The Applicant notes the OHAs' concerns. Due to the Change Request outlined in the Change Notification (Document ref **EN010147** Notification of Intention to Submit a Request to Change the Application (Change Request 2)) the extent of the solar panels will change.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Impacts on vegetation 7.3.119 Cable trenches, construction compounds and access points have the potential to cause the loss of existing characteristic vegetation including mature trees and hedgerows. Such losses have the potential to significantly affect local character and views not only during construction but also in the long-term as mature vegetation cannot be readily replaced by new planting. 7.3.121 Impacts on vegetation are proposed to be addressed through Strategic Arboricultural Impact Assessment and Method Statement **[APP-145-148]**, however, this provides insufficient detail about the retention and removal of trees and hedgerows to allow a judgement on related impacts. 7.3.122 The draft DCO (**[APP-015]** article 38 (felling or lopping of trees and removal of hedgerows)) suggest that vegetation removal can take place without requiring further consent. If this is the case, it is important that vegetation removal is sufficiently understood and mitigated prior to consent being given. If this is not possible the DCO consent should be clarified, and processes put in place to ensure any vegetation loss is agreed with the relevant parties prior to any works being carried out. This should clearly relate to hedgerow removal plans and AIA, and this must also include vegetation removal or works to facilitate wider highways and access works.	The Applicant notes the OHAs' concerns – please see the responses above re tree and hedgerow removal and replanting. The protection of trees within hedgerows, and as solitary specimens has been considered with regards to the guidance included within BS5837:2012. The submitted strategic arboricultural impact and method statement adopts a precautionary approach to determining root protection areas (RPA) and also it provides the methods which should be employed when working near to trees. As a "tree-protection-manual", knowledge of each and every precise tree stem diameter and associated RPA is not required to provide the safe retention of trees as part of the development. The site-wide practical elements of the scheme also provide a high level of tree protection. Individual post holes, associated with solar panels and fencing will in most cases have little effect upon the below ground root systems of trees and hedges, as the proportion of soil area affected by the post holes is *de minimus* when compared to the retained, unaffected areas of soils around each tree. To add to this, is the fact that most of the proposed development area comprises of agricultural fields, which, undoubtedly will have been mechanically ploughed in recent and past years. Agricultural ploughing will have limited tree root activity within the soils, therefore reducing the possible impact by the proposed solar arrays or fencing upon below ground root systems.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Cumulative Effects 7.3.123 The OHA have previously voiced their concerns about the cumulative impacts in their comments to the PEIR and RR (**[RR-0164]**, **[RR-0793]**, **[RR-1086]** and **[RR1102]**). 7.3.124 GLVIA3 para 7.4 states that the scope of cumulative landscape and visual effects should be agreed at the outset, in discussion with the competent authority and consultation bodies. An agreement has not taken place to date, and OHAs remain concerned about the cumulative effects of the development with other solar farms and major developments in the area.	The Applicant notes the OHAs' concerns – please see the response above re the sources of the data on cumulative projects. The cumulative schemes are mapped on Figures 20.1 to 20.3 Cumulative Development Scheme **[APP-116 to 118]**.	Landscape and Visual Impacts

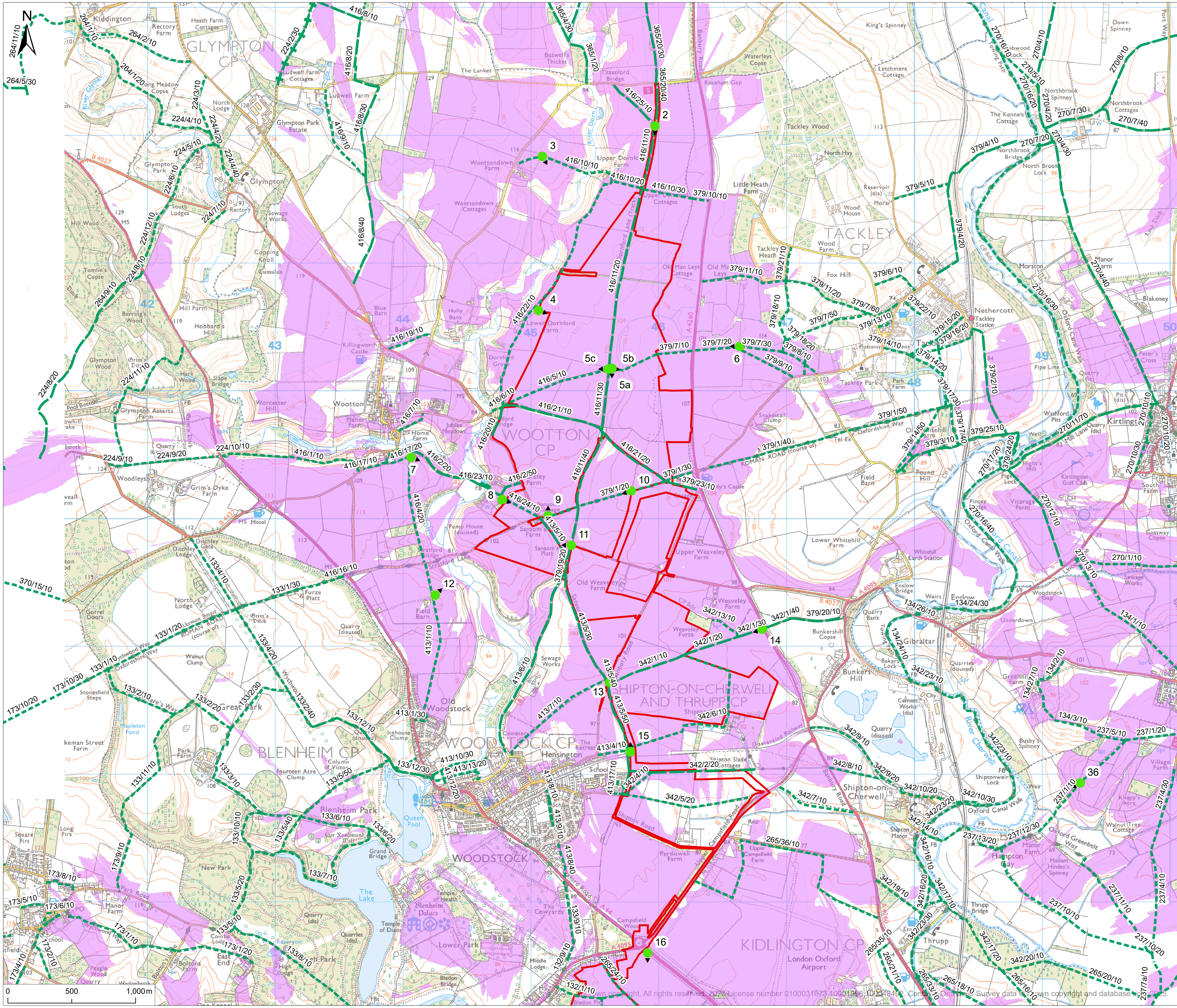
Name	Comment	Applicant's Response	Issues
	7.3.125 These concerns don't only relate to direct effects between the development and other schemes but also to the impact on the landscape and PRoWs as a recreational resource for existing and future residents and visitors. 7.3.126 The LUC review in Appendix 1 includes a section on cumulative effects (paras 2.56 – 2.58). In this it states that whilst the proposed schemes included in the cumulative assessment seem appropriate, the location of the schemes are not clearly presented in a mapped figure. It also highlights that the cumulative assessment only seems to consider cumulative interactions between the Proposed Development and each cumulative project on its own, rather than all the cumulative projects at the same time. This approach could potentially downplay the extent of cumulative effects, as it does not consider the full scenario, whereby multiple projects may co-exist in the landscape. 7.3.127 LUC therefore requests in its conclusions (paragraph 2.68) that the assessment methodology is revisited to ensure that "the assessment of cumulative effects considers the full scenario, whereby multiple projects may exist in the landscape." It is further requested in the same paragraph "that a mapped figure illustrating the locations of the schemes considered in the cumulative assessment is provided." (para 2.68). The OHAs support these requests. 7.3.128 The OHAs consider it important that all impacts related to the development are considered cumulatively and comprehensively. This also applies to the development itself, which effectively comprises four developments (the northern, central, southern site, and the substation). The need for a comprehensive assessment of all related structures also remains important, even if the NGET substation was to be moved outside the site boundary.		
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Landscape Management 7.3.129 The LVIA states that landscape management would be required for a period of five years (paragraph 8.9.259), which is wholly insufficient and in stark contrast to the approximately 40 years lifespan of the proposal and with the 30 years management referred to in the LEMP. Woodland creation and hedgerow establishment require longterm management to provide long-term benefits. 7.3.130 Ongoing landscape management will be fundamental to the success of this mitigation and would need to extend to the 40-year lifespan of the project. This will need to be embedded in the relevant control documents and, afterwards, implemented through contractual obligations and monitored to check that they meet the requirements.	The outline LEMP **[APP-235]** provides information on the landscape management of the landscape and ecological proposals beyond the five-year 'defects liability period' for the landscape proposals.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	Ease of access and presentation of the documentation 7.3.131 The information in the Landscape Chapter of the ES is presented in a way that makes it difficult to follow the submitted information, and cross-referencing between multiple sets of information is required to be able to look at the submitted information.	Noted.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	7.3.132 For example, the Representative Viewpoints: The location of these is given on the Representative Viewpoints Figure Number 8.11. This uses 1:50,000 as base mapping, which makes it difficult to see the exact locations of these Representative Viewpoints on the ground. The 1:50,000 mapping also gives limited information with regards to field boundaries and other landscape elements. The use of 1:25,000 mapping as a base map would therefore be preferrable as it is easier to follow even if it is not to scale. 7.3.133 The ZVT shading on plans makes it hard to follow the PRoW network in and adjacent to the site. There are no plans where the viewpoints are shown on the Masterplan layout to help understand what can be seen in the Representative Viewpoints. Due to the scale of the application, it is difficult to cross-reference plans to understand how viewpoints relate to the site layout. 7.3.134 There are no plans in the landscape package which clearly illustrate the existing and proposed Rights of Way (by type) including associated PRoW numbering, which are referred to in the text. While a numbered PRoW plan is giving in Figure 17.5, there is no plan where this information is projected on the Masterplan to aid understanding of the Representative Viewpoint locations. Whilst Representative Viewpoints are presented on a 1:50,000 plan extract, they do not contain the scheme layout to aid understanding of the view. Mapping at 1:50,000 also does not aid with the understanding of field boundaries, as the viewing arrow is small and does not illustrate the extents of the view on the photograph. 7.3.135 Photomontages do not coFntain a map extract to aid their understanding and illustrate the section of view shown and how that relates to the site layout.	The Applicant notes the OHAs' concerns. A figure has been provided with this response to the OHAs' Joint LIR, on which the representative viewpoints are marked, PRoW's are numbered and the translucency of the ZTV has been increased.	Landscape and Visual Impacts
Joint Local Impact Report of CDC, VWHD, WODC and OCC	The proposed development is established to be inappropriate development in the Oxford Green Belt. Inappropriate development in the Oxford Green Belt is, by definition, harmful and carries very substantial weight. Very Special Circumstances are not sufficient to outweigh the harm. **Section 7.1 – Green Belt** Policy Detail:	Only parts of the Project is within the Green Belt and policy is clear that not all development in the Green Belt is inappropriate. This is set out in Appendix 8 to the Applicants Planning Supporting Statement **[REP1-012]**. The Applicant welcomes the OHA's acceptance that the Project is Critical National Priority Infrastructure e.g. para 5.8 and 7.1.2, and that therefore that it meets the VSC test (amongst others). However, there appears to be an unintended error at para 7.1.16 where it states that:	

Name	Comment	Applicant's Response	Issues
	7.1.2 The proposed development is identified as CNP infrastructure. Paragraph 4.2.17 of EN-1 confirms that the Secretary of State will take as a starting point that schemes defined as CNP infrastructure meet (amongst other things) the test of very special circumstances within a Green Belt. 7.1.3 Cherwell Local Plan Policy ESD14: Oxford Green Belt seeks to ensure that the Oxford Green Belt boundaries within Cherwell District will be maintained. 7.1.4 Development proposals within the Green Belt will be assessed in accordance with government guidance contained in the NPPF and NPPG. Development within the Green Belt will only be permitted if it maintains the Green Belt's openness and does not conflict with the purposes of the Green Belt or harm its visual amenities. 7.1.5 Policy CP13 of LPP1 addresses development in the Oxford Green Belt and seeks to ensure the Green Belt is protected to maintain its openness and permanence. This policy specifies that within the Green Belt development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. 7.1.6 Policy DBC4 of CNP is a local iteration of national and local Green Belt Policy and recognises the importance of the Green Belt to the neighbourhood area. 7.1.7 WOLP OS2 states that all development in the Green Belt should comply with national policies for the Green Belt. Commentary: 7.1.8 The proposed development area is approximately 1,400 Ha with approximately 960 Ha falling within the Oxford Green Belt, which equates to approximately 60% of the total area. 7.1.9 The NPPF states that development in the Green Belt is inappropriate unless it falls within specified categories, which would not apply to the proposed development, and the main purpose of 'openness' would be preserved. Due to the size and nature of the development, the proposed solar farm would not comply with any such NPPF provisions, and the proposal would therefore be deemed to be inappropriate development in the Oxford Green Belt in respect of both the Central and Southern site areas. 7.1.10 NPPF paragraph 153 explains that inappropriate development in the Green Belt is, by definition, harmful and carries substantial weight. Such development should not be approved except in very special circumstances (VSC). It continues that very special circumstances will only exist if the harm to the Green Belt by its inappropriateness, and any other harm, would be clearly outweighed by other considerations. 7.1.11 Despite harm to the Green Belt attracting substantial negative weight, it has been established that renewable energy projects and associated infrastructure are not prohibited outright in the Green Belt. It is therefore a matter of balancing the benefits against any harm that would result from the development. 7.1.12 The NPPF adds (paragraph 160) that, when located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. 7.1.13 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. As advised in the NPPF (paragraph 142) the essential characteristics of Green Belts are their openness and their permanence. The openness of the Green Belt has both a spatial and visual aspect. 7.1.14 In addition, the Green Belt in West Oxfordshire provides a degree of policy protection for the outstanding universal value of the Blenheim Palace World Heritage Site. Previous consideration as to whether to impose a buffer for the Blenheim Palace WHS have been discounted due to the additional policy protection provided by the Oxford Green Belt. 7.1.15 From a spatial perspective, the proposal would introduce a substantial amount of development into an open area. This includes the panels and transformer units, along with the associated development of access tracks and security fencing. The visual impacts of the development are assessed in detail under the landscape and visual impact section of the LIR, but the development will result in the loss of visual openness of the Green Belt and thereby diminish the spatial openness of the Oxford Green Belt. 7.1.16 In the Planning Supporting Statement [APP-225] the Applicant recognises that "some parts" of the proposal constitutes inappropriate development in the Green Belt (paragraph 2.4.5). Very Special Circumstances (VSC) are therefore required to be demonstrated, and the OHA accept the proposed development meets the criteria of CNP infrastructure where the	*"...OHA accept the proposed development meets the criteria of CNP infrastructure where the Secretary of State will take as the starting point for decision making that such infrastructure would constitute Very Special Circumstances (VSC) to justify development..."* When it should state that the "...*Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:* • *where development within a Green Belt requires very special circumstances to justify development..."* The authority also note at 7.16.1 that : *"...Paragraph 4.1.7 of EN-1 states that for CNP developments the presumption of need outweighing harmful residual effects does not apply in the case of "impacts which present an unacceptable risk to, or interference with, ... public safety...".* They then draw attention to the unresolved concerns of the Oxford Airport and issues affecting safety with the operation of the Airport. However, the Applicant is about to agree a SoCG with the Airport which confirms its safety concerns have been met and the Applicants layout will be adjusted to accommodate those safety concerns (and be the subject of a second Change Request application). That being the case, the Applicant still benefits from the CNP presumption that need outweighs residual effects. **Section 4** of the document refers to planning history, specifically a retrospective application for an outdoor adventure centre, including camping areas and associated facilities, including parking and turning area. The applications were dismissed at appeal due to the visual effects of the hardstanding and human activity on the area of Ancient Woodland within which they were situated, harming the Ancient Woodland, and also their intrusion on the Green Belt and failure to preserve openness. Although not mentioned in the LIR, the Inspector gave consideration to whether there were 'very special circumstances' and in particular that the proposed retention of the outdoor adventure use would contribute educational benefits to local school children, developing confidence and social skills, and he attached significant weight to this – but overall considered that it did not clearly outweigh the harm to the Green Belt. **Section 5** sets out the policy and legislative context. In terms of NPS EN-1 the OHA refers to some 11 paragraph references whereas the Applicant refers to some 50 paragraph references as being relevant to the Project [REP12-012, Appendix 1]. The authority, for example omit references to urgent need (para 3.2.6), and for substantial weight to be attached to this need (para 3.2.7). Whilst the OHA recognise Botley West is CNP infrastructure, it omits reference to 3.3.63 which subject to any legal requirements, makes clear "..the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, and that CNP infrastructure will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible..." Of note, is that the OHA also omit references to the presumption set out in 4.2.16 and 4.2.17, which state that "...*As a result, the Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. 4.2.17 This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:* • *where development within a Green Belt requires very special circumstances to justify development;..."* Similarly, the OHA generally cite limited paragraph references from NPS EN-3, NPS EN-5, and the NPPF compared to the references given by the Applicant in Appendices 2,3 and 7 in the PSS [REP1-012]. The OHA then set out lists of applicable policies from the local development plans. The Applicant has no dispute in terms of the weight to attached to these plans. Policies in these plans have largely been addressed by the Applicant in the appendices to its Planning Supporting Statement [REP1-012], Appendices 4,5 and 6. However, it wishes to clarify its response to Policy DBC7, important local views, in the Cumnor Parish Neighbourhood Plan. Consultation with the host authorities was carried out to determine the suitability of the selected Representative Viewpoints. Where alternative / additional Representative Viewpoints were suggested or asked for, these were visited and either included as part of the final selected Representative Viewpoints or discounted. Refer to individual host authorities within table 8.5 of the LVIA [APP-045]. This included referral and consideration of Important Views as	

Name	Comment	Applicant's Response	Issues
	Secretary of State will take as the starting point for decision making that such infrastructure would constitute Very Special Circumstances (VSC) to justify development. Adequacy of the application/DCO: 7.1.17 The applicant's VSC are listed in paragraph 8.4.57 of appendix 8 of the Planning Supporting Statement [APP-225] and the OHA respond to each as follows. VSC 1 - Meeting the urgent need for secure, clean, renewable energy - 7.1.18 Limited weight – the same benefits could be achieved elsewhere on land outside of the Oxford Green Belt. VSC 2 - Overall compliance with relevant NPS and relevant parts of approved and emerging plans - 7.1.20 Neutral weight – all sustainable development would need to comply with adopted development plans and national policy VSC 3 - Renewable energy to power the equivalent of 330,000 homes - 7.1.21 No weight – the same benefits could be achieved elsewhere on land outside the Oxford Green Belt. VSC 4 - Biodiversity Net Gain - 7.1.23 No weight – the same benefits could be achieved elsewhere on land outside of the Oxford Green Belt. VSC 5 – Economic, Educational and Sustainability Benefits - 7.1.24 No weight – the same benefits could be achieved elsewhere on land outside of the Oxford Green Belt. VSC 6 - Landscape and Access legacy - 7.1.25 No weight – Landscaping is only being provided to mitigate harm of the proposed development, and this is not a landscape in need of repair. VSC 7 - Community Benefit Fund - 7.1.26 No weight – this is not a material planning consideration. VSC 8 - Discounted electricity prices - 7.1.27 No weight – this is not a material planning consideration. Conclusion: 7.1.28 The proposal would introduce a substantial amount of new development into open countryside and have a significant impact on openness for more than a generation, conflicting with the purposes of Green Belt. 7.1.29 In support of this assertion an Inspector dismissed an appeal for a solar farm in the Green Belt. OHA's response concludes with reference to Appeal Ref: APP/A1910/W/23/3317818, concerning the view of the Inspector in dismissing this appeal that "it cannot be right that the fact that approval is sought for a 40-year period is accorded more than very limited weight in favour of the scheme in relation to the loss of openness. To do so would go against the concept of permanence. **Section 4: Relevant Planning History** 4.2 Two planning applications of note relating to development within the Green Belt and development affecting Ancient Woodland are covered by the applicant's cumulative developments longlist and shortlist [APP-224]. 4.3 The Planning Inspectorate issued Appeal Decisions in relation to the above planning applications on 16 July 2024 with the following references; • Appeal A Ref: APP/D3125/W/23/3326709 • Appeal B Ref: APP/D3125/W/23/3326710 4.4 Appeal A relates to an area of woodland and open areas to the east of Cassington Road and appeal B relates to a woodland area to the west of Cassington Road, both of which are in the administrative area of WODC. The car park for appeal B is within the area of the proposed development. 4.5 Both appeals were dismissed. 4.6 The OHA consider the planning history detailed above to be relevant to the assessment of local impacts for the proposed development, due to the spatial relationship of the land parcels in question and the matters relevant to determining the Planning Applications and subsequent appeal decisions. 4.7 For the purposes of assessing cumulative effects (and the local impacts of the proposed development), the LIR relies on the list of cumulative schemes set out in Chapter 20 of the ES [APP-057]. **Section 5: Legislative and Policy Context**	detailed in the Cumnor Parish Neighbourhood Plan. A number of Representative Viewpoints are selected as representative of these important views where possible in publicly accessible locations. Not all important views were considered relevant due to the direction of the views. Where possible, viewpoint locations were selected based on published important views, such as those identified in the Cumnor Parish Neighbourhood Plan Important Views Report (February 2021). All viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects. Important views within the Cumnor Parish Neighbourhood Plan Important Views Report February 2021 were considered, with many discounted due to the focus and / or direction of the views. Where possible important views were included, taken from publicly accessible location as close as possible to the published view(s). These include Representative Viewpoints 45, 46 and 53 [APP-065 and 066]. **Section 6** then examines the principle of the development. The Applicant welcomes the in-principle support for renewables (para 6.1) in the OHA areas, and the recognition that a significant increase in ground mounted solar is required. The OHA state in paras in 6.12 that: "*.. The OHA support the Oxfordshire Strategic Vision to achieve carbon neutral status and a carbon neutral future by 2050, and the Government's commitment to deliver a zero carbon electricity system by 2035.* *6.13 To achieve this aim, the 2018 Oxfordshire Energy Strategy and the subsequent 2021 Pathways to a Zero Carbon Oxfordshire report, both adopted by the OHA, set out a requirement for a four-fold increase in installed PV capacity in Oxfordshire by 2030 and 13-fold by 2050. Both envisage a significant increase in ground mounted solar farms, along with other methods such as installations on buildings. In this regard a development such as this is acknowledged as an important development for the future energy needs of the county, and the UK...*" The OHA then have a comment relating to the quantum of need (see Table 3 and associated text, pages 26 to 28). Based on the assumptions made (which exclude the contribution from Botley West and assumes all other connected and accepted to connect projects come forward), the OHA claim that they may only need to provide a further 500MW of capacity to meet their needs to 2050 (not the 850MW from Botley West). However, as the OHA accept themselves, this assumes that those schemes 'accepted to connect', making up approx. 1.53 GW (85%) of the total potential supply, may not apply for or receive planning permission. The Applicant does not believe it is prudent nor accurate analysis to claim 'oversupply' of schemes by reference to a register or registers of schemes the significant majority of which have not submitted planning applications, have not demonstrated that they have secured land or have had these applications granted This is particularly relevant in relation to NESO has shown historically that "only 30-40% of projects in the [connections] queue make it to fruition" [https://www.neso.energy/news/eso-leads-way-major-initiative-accelerate-connections-electricity-transmission-grid] and is engaged in an ongoing 'Connections Reform' activity which seeks to remove projects which are "speculative or do not have the necessary funding or planning permission to progress" from connection queues [Page 65 of the Clean Power 2030 Action Plan]. We note the energy needs analysis presented by Cherwell District. It is important to recognise that the Scheme is not designed solely to meet the local needs of Cherwell but is a nationally significant scheme which is designed to contribute to meeting national decarbonisation and energy security needs as established in the National Policy Statements. Therefore, while the Applicant does not comment directly on the numerical conclusions of the Cherwell analysis, it notes that at national policy level, paras 3.2.3 and 3.2.4 in NPS EN-1 make it clear there are no limit or cap to the amount of renewable energy that can be consented. In addition, paras 3.2.6, 3.2.7 and 3.2.8 make it clear that need has been demonstrated, it is urgent, substantial weight should be attributed to that need and that the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS. The OHA also examines 'local impacts' in **Section 7** of the report. In terms of Green Belt the Applicant's case is already set out in its Planning Supporting Statement, Appendix 8 (REP1-012]. It is only modified as a result of the February 2025 PPG on Green Belts. In summary there is no change to the assessments given apart from Purpose B -to prevent neighbouring towns merging into one another. Here Conflict is less than previously assumed. In their analysis, the Applicant had incorrectly identified that the narrowest point of the Green Belt which the project affected, was between Bladon and Begbroke. Under the new guidance this analysis is redundant insofar as both these settlements are 'villages' and these are now excluded from assessment in the latest guidance. The nearest 'towns' now affected by the Project are Woodstock to the north, Witney to the	

Name	Comment	Applicant's Response	Issues
	5.2 The legislative basis for the proposed development is set out in the Planning Act 2008, which defines the process under which consent for NSIPs are determined, and secondary legislation made under that Act. 5.3 In accordance with Section 104(2) of the Planning Act 2008, the Secretary of State is required to have regard to any relevant national policy statements (NPS), amongst other matters, when deciding whether or not to grant a development consent. 5.4 The relevant NPSs to this NSIP are as follows: • EN-1 Overarching National Policy Statement for Energy; • EN-3 Renewable Energy Infrastructures; and • EN-5 Electricity Networks Infrastructure. 5.18 The NPPF (December 2024) is a material consideration for determining planning applications under the Town and Country Planning Act 1990 (TCPA 1990). 5.21 The National Planning Policy Guidance (NPPG) on renewable and low carbon energy outlines guidance on the specific considerations that relate to large scale groundmounted solar PV farms (013 Reference ID: 5-013-20150327). 5.24 Written Ministerial Statements ("WMS") 5.24 On 15th May 2024 the former Energy Security Secretary told Parliament that with growing geopolitical tension, the best agricultural land must be protected for food security. It was stressed that the government aims to prioritise the best agricultural land for food production, ensuring that large solar projects avoid high-quality land and are instead developed on brownfield, contaminated, industrial, or lower-quality agricultural land. Local Planning Policy Context: 5.27 When determining an application for development consent, by section 104(2)(d), the Secretary of State must have regard to any other matters the Secretary of State thinks are both important and relevant matters and this could include local planning policy. 5.28 The local planning policies present a significant material consideration, particularly where they are consistent with NPSs. 5.29 Additionally, the policies provide a clear framework by which the councils wish to see new development come forward within their areas, which should be weighed in the overall planning balance. **Section 6: The Principle of the Development** 6.1 The OHA support, in principle, renewable energy developments within their administrative areas. 6.4 Potential adverse impacts to be addressed are: • Landscape and biodiversity including designations, protected habitats and species, and Conservation Target Areas • Visual impacts on local landscapes • The historic environment including designated and non-designated assets and their settings • The Green Belt, particularly visual impacts on openness • Aviation activities • Highways and access issues, and Residential amenity. Commentary 6.12 The OHA support the Oxfordshire Strategic Vision to achieve carbon neutral status and a carbon neutral future by 2050, and the Government's commitment to deliver a zero carbon electricity system by 2035. 6.13 To achieve this aim, the 2018 Oxfordshire Energy Strategy and the subsequent 2021 Pathways to a Zero Carbon Oxfordshire report, both adopted by the OHA, set out a requirement for a four-fold increase in installed PV capacity in Oxfordshire by 2030 and 13-fold by 2050. Both envisage a significant increase in ground mounted solar farms, along with other methods such as installations on buildings. In this regard a development such as this is acknowledged as an important development for the future energy needs of the county, and the UK. 6.21 In Cherwell, taking account of the current deployment of solar PV and the capacity for roof top solar PV, the Cherwell Solar PV Strategy concludes that a reasonable target for 28 the district for ground mounted solar PV is an additional 125MW by 2030. Based on a rough estimate of the number of hectares of solar panels proposed by this development in this district it would provide more than this MW capacity for Cherwell.	west, Oxford to the east and Abingdon to the south. Given the much more significant areas of openness between these towns and the Project, the threat of merging is diluted even further. In the OHA's conclusions however (para 7.1.16), they incorrectly interpret the presumption afforded to CNP infrastructure. It should state that *Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances*. In a Green Belt context, that means the VSC case has been met; that's the starting point. The Applicant had made out the VSC case in their PSS and the authority accept the first VSC case. Extraordinarily, in the Applicants view, neutral or no weight is given by the OHA's to VSC case number 1, 3, 4 and 5 but only on the basis that *' the same benefits could be achieved elsewhere on land outside the Oxford Green Belt'*. In the Applicant's view to deny the existence of VSC's using an argument that assumes the benefits might be achieved on some other site elsewhere is flawed for reasons including: First is that it is Government policy that the Applicant notes that the SofS should not refuse an application on one site simply because fewer adverse effects would result from developing similar structure on another suitable site – all suitable sites may be needed – NPS EN-1 para 4.3.24. The OHA's appear to hope that another site is available and is adopting a stance that policy rejects i.e. suggesting another site may be better. Second, the OHA's position ignores the urgent need to this type of infrastructure, and the CNP presumption in favour of sites like Botley West – including that, as a starting point, the VSC case is met. Thirdly, proposals that are vague (NPS EN-1, para 4.3.28) can be excluded from consideration. The OHA's have not directed the applicant to any site beyond the Green Belt, no site is allocated, and therefore their claim of another site 'elsewhere' is vague in the extreme. It would be running against the well-established planning approach that is to consider each application on its merits. Cherwell District has Policy ESD5 which will allow development in principle for renewable energy subject to meeting certain criteria, and in the Applicant's view, the Botley West project, in its present location, could be favourably considered against this policy if the authority so wished. Similarly, Vale has Core Policy 41 and South Oxfordshire has Policy DES9. Thirdly, the OHA's are requesting more information on what other sites outside the Green Belt have been considered and reasons for their rejection. However, the NPS policy on site selection, is not overtly prescriptive, there is no absolute criterion that *has* to be followed when site finding. There is no site finding policy hurdle that has to be passed before the OHA's can support the Botley West proposal in its current location. They do not have to have any more information than the Applicant has already supplied in respect of alternatives considered, before supporting Botley West solar farm. Fundamentally, the Applicant has been led by: - Factors that are noted as influencing site selection are set out in NPS EN-3, para 2.10.18 - Plus guidance relating to the assessment and minimising adverse effects – the applicants assessment section of EN-3 The Applicant has followed this policy. The chronology followed and the reasons for the location is set out in Chapter 5; substation location was very important but there was no one overriding or determinative factor that drove the site selected or size. It was a combination of factors. In NPS EN-3, para 2.3.5, it states that *It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure….* There is nothing preventing development in principle in Green Belt locations in national policy terms. In respect of whether there is a sequential test or consecutive approach when it comes to finding development sites in Green Belts, as some IP's claim i.e. that one has to consider brownfield sites first before selecting other Green Belt land, the Applicants position is that policy in this respect is a 'preference' not an absolute 'requirement'. This position is explained below. NPS EN-3 para. 2.10.29 and 2.10.31 does make a reference to this matter.	

Name	Comment	Applicant's Response	Issues
	6.22 Given this, the OHAs consider there is a need to provide a strong and robust case for development of this scale, particularly to demonstrate very special circumstances to justify development within the Green Belt; to justify impacts on the setting of a number of heritage assets including the setting of the Blenheim Palace World Heritage Site; along with mitigating other environmental impacts. **Section 9: Summary and Conclusion** 9.1 This report has assessed the impacts of the proposed development that have been identified within the applicant's Environmental Statement, within the context of the OHA local knowledge and understanding of the area, and with reference to relevant local and national policies. 9.2 The Botley West Solar Farm will result in numerous impacts summarised in Table 21. 9.3 The provision of renewable energy of the nature proposed is supported in principle. Notwithstanding, CDC, VWHDC, WODC and OCC recognise that the delivery of new renewable energy infrastructure must be weighed against the wider environmental, economic and social impacts to ensure that the negative impacts do not outweigh any broader benefits that may arise from the proposed development. 9.4 This report has identified negative impacts that would result from the proposed development. 9.5 The OHA request that the Secretary of State has regard to this Local Impact Report when making their decision.	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, did not rule out the use of previously developed or brownfield land. For example, the Applicant did look 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 Applicants enquiry, both the land (part of) and connection was subsequently used by a recently consented, and now constructed, data centre. The Applicants approach to site selection is consistent with all relevant aspects of the NPS's. It has responded to 'preferences' in so far as the site search did include brownfield land. **Section 9** is the OHA's summary and conclusions. Here the OHA's do not appear to have undertaken a planning balance exercise and properly weighed into the balance the national policy support evident for CNP infrastructure projects like that of Botley West. They list in summary form whether certain impacts result in positive, neutral or negative outcomes. There are no positive outcomes, and many neutral or negative outcomes. This is perhaps unsurprising when one considers those conclusions are not yet fully adjusted to allow for the significant weight afforded to CNP projects such as Botley West by the suite of NPS's relevant to renewable energy projects. The Applicant has drawn the ExA attention to the fact that in the OHA's summary of national policies there were significant omissions in respect of policy references to the urgent need, the significant weight to be attached to that need, nor to the express recognition that CNP infrastructure should benefit from Secretary of State's starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.	



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Legend

- Order Limits
- Representative Viewpoints
- Byway Open to All Traffic
- Bridleway
- Footpath
- Restricted Byway
- Zone of Theoretical Visibility - Built Elements and Solar Panels

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

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Client PVDP

Project Botley West Solar Farm

Title ZTV with Public Rights of Way - North

Status	Drawn By	PM/Checked By
FINAL	MS	CD

Drawing Number	Scale @ A3	Date Created
NP12426-0233-02	1:28,000	JUNE 2025

Figure Number	Rev
12.3.1	-

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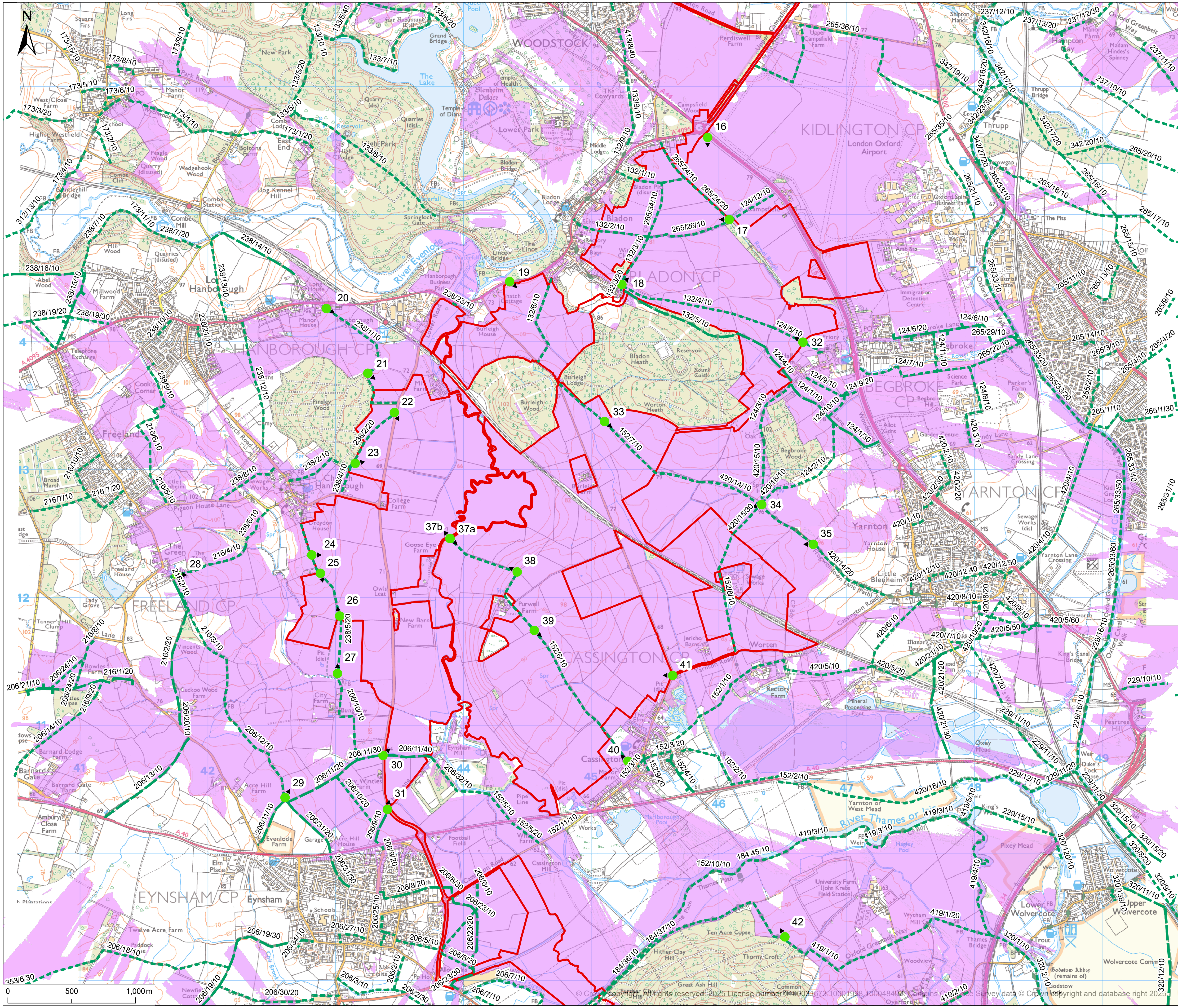

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Legend

- Order Limits
- Representative Viewpoints
- Byway Open to All Traffic
- Bridleway
- Footpath
- Restricted Byway
- Zone of Theoretical Visibility - Built Elements and Solar Panels

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

rps A TETRA TECH COMPANY

Client PVDP

Project Botley West Solar Farm

Title ZTV with Public Rights of Way - Central

Status	Drawn By	PM/Checked By
FINAL	MS	CD
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NP12426-0233-02	1:28,000	JUNE 2025

Figure Number 12.3.2

Rev -

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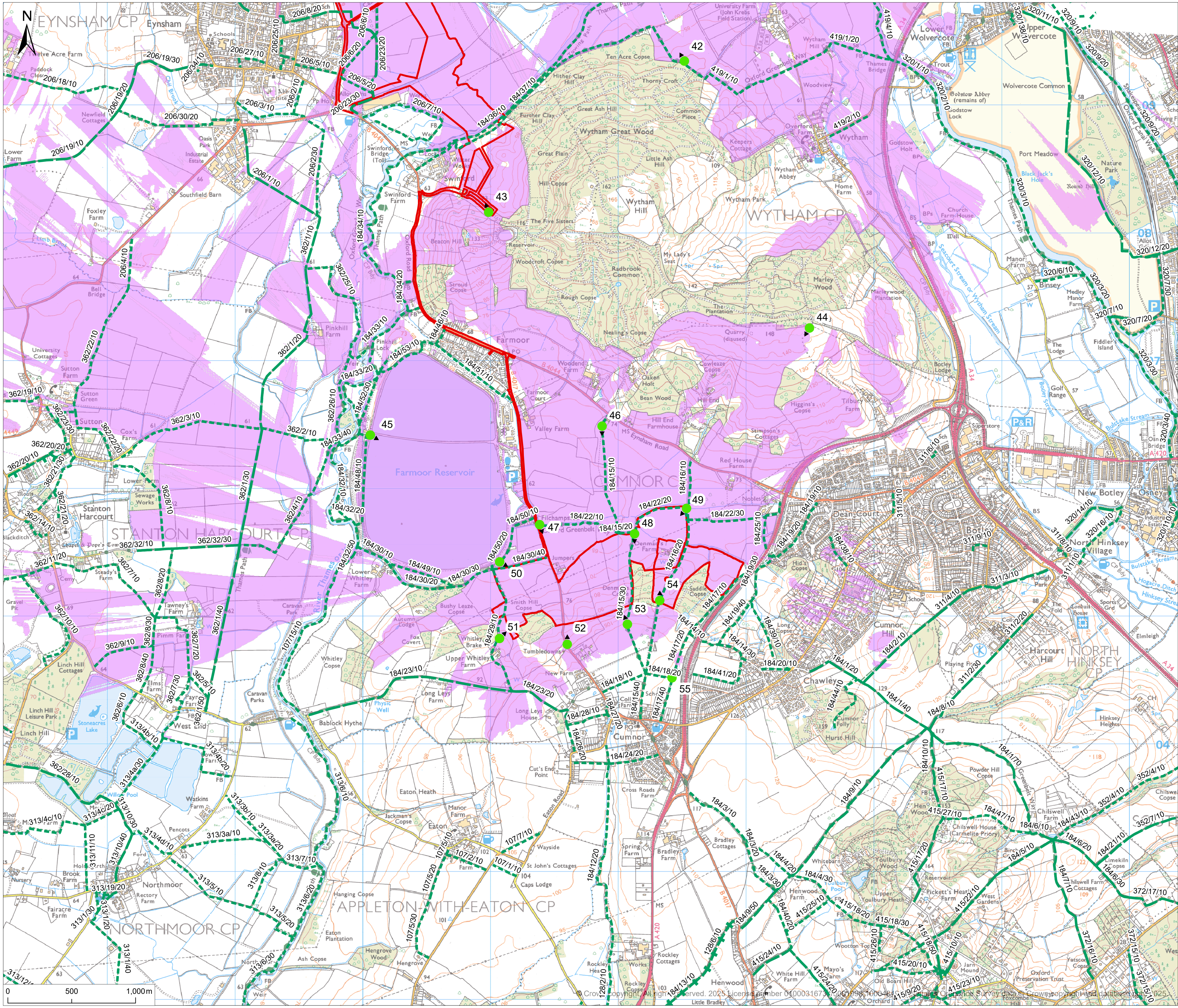

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Legend

- Order Limits
- Representative Viewpoints
- Byway Open to All Traffic
- Bridleway
- Footpath
- Restricted Byway
- Zone of Theoretical Visibility - Built Elements and Solar Panels

Rev	Description	By	CB	Date

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Client PVDP

Project Botley West Solar Farm

Title ZTV with Public Rights of Way - South

Status	Drawn By	PM/Checked By
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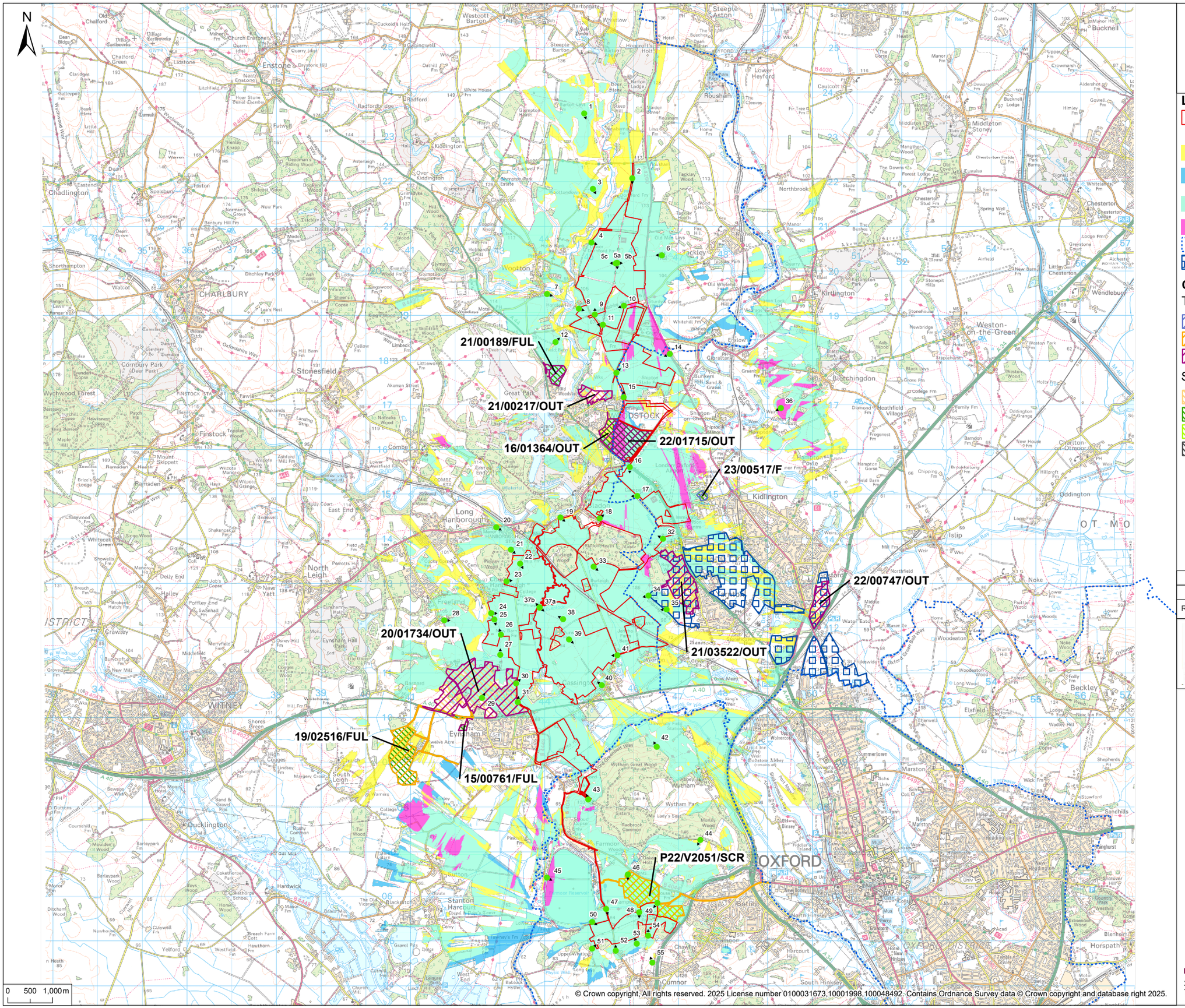

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Legend

- Order Limits
- Representative Viewpoints
- Zone of Theoretical Visibility - Panels
- Zone of Theoretical Visibility - Built Elements
- Zone of Theoretical Visibility - Panels and Built Elements
- Areas where multiple sections are visible
- Local Authority Boundary
- Cherwell Strategic Development Sites

Cumulative Developments

Type
- Commercial
- Energy
- Residential

Status
- Pending
- Permitted
- Screening decision - positive
- Withdrawn

Rev	Description	By	CB	Date

PHOTOVOLT DEVELOPMENT PARTNERS

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Client PVDP

Project Botley West Solar Farm

Title Cumulative schemes assessed within the LVIA

Status	Drawn By	PM/Checked By
DRAFT	PE/JM	CD

Drawing Number	Scale @ A3	Date Created
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Figure Number **12.3.4**

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