Botley West Solar Farm

Applicant's Responses to Written Representations Submitted at Deadline 1

July 2025

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Approval for issue	
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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 Written Representations 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. To avoid repetition the Applicant has focused on comments that make points that have not been addressed previously, within the Applicant's Responses to Relevant Representations **[REP1-020]** and Responses to the Examining Authority's Written Questions for Deadline 1 **[EN010147_APP_12.2]**, or where the Applicant considers that further clarification may be useful.

1.2 Structure of this document

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

1.2.2 Table 2.1: Applicant's Responses to Written Representations submitted at Deadline 1 – Local Authorities and Statutory Consultees

1.2.3 Table 2.2: Applicant's Responses to Written Representations submitted at Deadline 1 – Non-Statutory Consultees

1.2.4 Table 2.3: Applicant's Responses to Written Representations submitted at Deadline 1 – Public/Landowner

1.2.5 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.

1.2.6 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.

1.2.7 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. All documents are also presented in numerical order in the Guide to the Application **[REP1-003]**.

Table 1.1: List of Interested Parties that submitted Written Representations at Deadline 1

WR/Examination Reference Number	Interested Party
REP1-049	Cassington Parish Council
REP1-050	Cassington Parish Council
REP1-056	Cumnor Parish Council
REP1-057	Cumnor Parish Council
REP1-058	Cumnor Parish Council
REP1-059	Cumnor Parish Council

REP1-060	Cumnor Parish Council
REP1-061	Cumnor Parish Council
REP1-062	Cumnor Parish Council
REP1-063	Cumnor Parish Council
REP1-064	Cumnor Parish Council
REP1-075	Vale of White Horse District Council
REP1-076	Vale of White Horse District Council
REP1-081	West Oxfordshire District Council
REP1-082	Defence Infrastructure Organisation
REP1-085	Historic England
REP1-086	Historic England
REP1-087	Natural England
REP1-088	Network Rail Infrastructure Limited
REP1-091	Begbroke and Yarnton Green Belt Campaign
REP1-092	Begbroke and Yarnton Green Belt Campaign
REP1-093	Begbroke and Yarnton Green Belt Campaign
REP1-094	Begbroke and Yarnton Green Belt Campaign
REP1-095	Begbroke and Yarnton Green Belt Campaign
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)
REP1-104	John Wynne - The Glyme Valley Project
REP1-106	National Grid Electricity Transmission Plc
REP1-108	Oxford Aviation Services Limited
REP1-109	Oxford School of Drama
REP1-110	Siemens Healthcare Limited
REP1-111	Southern Gas Networks plc
REP1-115	Stop Botley West
REP1-119	Stop Botley West
REP1-120	Stop Botley West
REP1-126	Thames Water Top of Form
REP1-128	Worton Farms Ltd
REP1-129	Worton Farms Ltd
REP1-131	Bojan Ivanovic
REP1-132	Bojan Ivanovic
REP1-134	Colin Carritt
REP1-135	Castell Hugh Atherstone
REP1-137	Councillor Dan Levy

REP1-141	Dermot Magee
REP1-142	Dustin Sean Dryden
REP1-144	Geoffrey Peter Goddard
REP1-147	Harry St John
REP1-148	Harry St John
REP1-155	Michael Brown
REP1-156	Michael Field
REP1-160	Mike Gorick
REP1-161	Miles Tuely
REP1-162	Nigel Roderick Pearce
REP1-163	Nigel Roderick Pearce
REP1-170	Professor John Dowling
REP1-171	Penelope Marcus
REP1-172	Penelope Marcus
REP1-174	Rosemary Lewis
REP1-176	Russell Tucker
REP1-177	Ruth Atherstone
REP1-178	Stephen Hurst
REP1-179	Steven Jenkins
REP1-180	Stuart Brooks
REP1-181	Sylvia Hurst

2 Applicant's Responses to Written Representations provided at Deadline 1

2.1 Local Authorities and Statutory Consultees

Table 2.1: Applicant's Responses to Written Representations provided at Deadline 1 – Local Authorities and Statutory Consultees

Examination Library Ref.	Name	Comment	Applicant's Response	Issue
REP1-049	Cassington Parish Council	This independent review of flood risk and drainage follows on from a review undertaken in 2024 by the same consultant on the PEIR. It identifies that the Applicant has done little to address the critical inadequacies and omissions in the earlier stage of the project design and assessment process. Specifically, the Applicant's submissions on Hydrology and Flood Risk fail to adequately consider the increase in pluvial flood risk to surrounding village communities due to storm rainfall run-off from the solar panels. Consequently, there is no consideration given to the significant water management infrastructure required to be compliant with the statutory regulatory regimes. The additional analysis and optioneering work undertaken by the Applicant to inform pluvial storm water flood risk reduction measures for Cassington village –notwithstanding its own limitations and lack of risk reduction measure detailed design and assessed effectiveness - highlights the inadequacies of the Applicant's approach for other storm water flow routes leaving the site. Without such risk measures being put in place, the development will increase downslope and downstream flooding risks, a situation which is not permitted under planning. Furthermore, the Applicant has not demonstrated they will be able to adequately manage surface water run-off and sediment mobilisation during the construction period, which given the size of the scheme and natural terrain geometry will cause challenges which could prevent delivering the proposed development. Accordingly, we consider the DCO cannot be approved, and these issues should be subject to a public hearing.	The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. We have since been supplied with further recent technical studies in regards to solar farms, which have been reviewed and assessed as part of our responses at DL2. The literature provided assumes that the ground conditions would stay the same, and all runoff would drip off the lowest leading edge. This is not the case for Botley West as detailed within Appendix 10.2 Conceptual Drainage Strategy **[APP-167]**. Gaps between individual solar cells within the PV modules act to reduce this concentration of water flow towards the drip line and provide an alternate route for rainwater to reach the ground. Whilst solar PV modules can result in a minor increased concentration of rainwater in these locations, landscaping is proposed to reduce, slow and distribute the surface water runoff. Using wildflower seed mixes for planting beneath the solar PV modules will promote infiltration into the underlying soils and the interception of rainwater, mimicking baseline natural land drainage conditions. During more extreme events, some water will run-off through the vegetation; however, this is in the same response as the greenfield (baseline) conditions. As most of the existing land is arable/grazed farmland, the change in landscaping itself is expected to reduce run-off rates. The Applicant has demonstrated compliance with the NPPF and NPS in demonstrating that there is no significant increase in flood risk at or off-site as a result of the Proposed Development. Whilst we note existing flood risk issues off-site at Cassington, Botley West Solar Farm is not required by policy to improve off-site flood risk and instead should be assessed against the baseline conditions to ensure there is no detrimental increase. Nonetheless, further investigation has been done based on the study conducted by Atkins (Cassington NFM, Cassington, Oxfordshire, February 2020) on the Cassington flood risk. Cassington and the local area have a pre-existing history of flooding. Flows are directed by topography, which slopes south towards Cassington. Surface water modelling has been undertaken for the catchment area upstream and including Cassington. The results of which are detailed in Appendix 10.5: Surface Water Modelling Report **[APP-172]**. Potential natural flood management options have been considered as part of this study and a wide range of options can be incorporated upstream of the village to reduce the flow and provide attenuation of flood water. The proposed mitigation measures will be tested at detailed design stage. We note the concerns regarding sediment mobilisation during construction and proposes to add to add to the Code of Construction Plan (CoCP) that Sediment Control Measures (silt fences, settlement/attenuation ponds, etc.) are to be used where required. This will be referenced within an updated CoCP, and an updated ES Chapter 10 - Hydrology and Flood Risk **[APP-047]** at DL3.	Hydrology and Flood risk
REP1-050	Cassington Parish Council - Flood Risk Related Matters	Overview of Proposed Project Applicant's Flood Risk Documentation The Applicant's documentation has not changed substantively since being reviewed as the PEIR reports in mid2024, with the exception of the greater focus on storm water flood risk assessment around the Cassington area. Nonetheless, the concerns expressed in the July 2024 are repeated here again, to ensure it is understood these concerns remain valid. Groundwater Flooding Risk The potential for groundwater and sewer flood risk changing is considered by this review to also be limited given the general lack of underground infrastructure in the area. Effects are expected to be localised and any disturbance of sewers will need prior permission from the wastewater utility service provider. Whilst no details are provided, any such dewatering work will be regulated by the Environment Agency and should therefore follow conventional engineering best practice and impact mitigation. Pluvial (overland storm rainfall runoff) Flooding Risk The most critical issue, in our opinion, is pluvial flooding risks associated with increased overland surface storm rainfall run-off due to the proposed development. The new Cassington surface water modelling work shows reduced areas and depths of flooding compared to the EA pluvial flood maps but still calculates flood flows passing through the village and impacting on properties. The Applicant does state however that the model is not calibrated, does not include measurements of culverts, nor include urban pipework. The numerical modelling has been used to identify possible approaches to reducing the pluvial flood risk to Cassington eg ponds, bunds	The Applicant acknowledges the concerns raised regarding the Cassington surface water modelling, flood hazard, drainage strategy, and associated uncertainties, particularly the lack of infiltration testing and detailed design at this stage. We note the existing surface water risk at Cassington owing to overland flow, limited ditches and culvert flow. The primary concern raised is in regard to surface water flood risk. The Applicant's surface water modelling for Cassington is an evolving tool designed to understand flood flow paths, depths, and velocities. While the current model is uncalibrated and excludes some features (e.g., eastern flow route, culverts, urban pipework), it has identified key flood flow patterns and areas of potential mitigation. The Applicant commits to ongoing refinement and calibration of the model in consultation with the Environment Agency and local stakeholders during the detailed design stage. The modelling outputs have informed initial mitigation concepts such as ponds, bunds, and ditch widening; these will be subject to further testing and optimization to ensure effectiveness and avoid adverse downstream impacts. It is important to note that the modelling work undertaken is not required under the NPS EN-1 and NPPF but, has been undertaken to seek a betterment to an existing flood risk issue. The drainage strategy is currently at a conceptual stage, structured into components for solar panels, ancillary buildings, transformers, and substations, recognizing the differing runoff characteristics and impermeable areas.	Hydrology and Flood risk

and ditch widening. But the model has not then been used to test the effectiveness of these approaches – so the extent to which they might deliver sufficient, or any, benefit is unproven. Indeed, it is possible that ditch widening could increase flooding further downstream.

As per their position in the PEIR, the Applicant continues to believe the solar panels themselves will not significantly increase in run-off. We discuss this further in the next section, along with their proposed solar panel flood risk reduction measures, which by their very existence confirms the Applicant does accept solar panels will increase storm water run-off and therefore pluvial flood risk, compared to the pre-development situation. To be clear, national, county and local policies, plans and legislation require any development to ensure that the storm run-off which leaves the development footprint must not have a greater peak flow or total volume of flow compared to the pre-development situation.

The Applicant states clearly in the latest documentation that the drainage systems have been developed as far as concept designs, but they have yet to determine the methods of surface water flow discharge, nor have they determined the locations of off-site discharges, and hence have no site-specific detailed designs, which will be left to a later detailed design stage. Furthermore, despite a 12-month period passing since the PEIR documentation became available, the Applicant still have not undertaken any infiltration testing on the site.

We therefore continue to consider the lack of infiltration testing to be a critical issue in that the Applicant has no quantitative understanding of the extent to which they will be able to infiltrate water into the ground and therefore they cannot determine with any confidence, the size of attenuation ponds they require or whether there is room for the required size of ponds where they will be required to be sited. To be clear, they have not demonstrated the feasibility or viability of their proposed drainage schemes.

What the Applicant does recognise is that the solar panels will increase erosion. They suggest this increase in erosion risk is mitigated by a well-managed organic vegetation grassland – although then refer in their documentation to the vegetation being managed organically (mowed or lightly grazed), which actually consequently means there will be a continuously variable and changing seasonal vegetation cover, that is to say the mitigation measures will have no design and therefore there is no confidence they will be effective in extreme storm events, up to and including the 1 in 100 Year return period storm.

Solar Panel Run-Off

As per the PEIR documentation, the Applicant continues to state that solar panels do not significantly increase run-off peak flow and volumes from solar developments. The Applicant now includes specific sections on this issue, but now refers to how the solar panel impact of increasing run-off will be reduced, eg low slope angles, gaps between arrays and panels, filter strips and permeable access tracks. It is clear therefore that the Applicant now accepts solar panels will increase rainfall run-off but they are articulating that they are attempting to minimise this increase. It is not clear whether they consider the mitigation measures adequate to return the storm run-off flows to pre-development levels, and especially for extreme rainfall events (up to 1 in 100 Year + climate change allowance, return periods). Whilst we do not agree that gaps between panels and arrays will reduce run-off, as the size of the panelled area installed remains the same, we do point out that lower slope angles mean a greater ‘effective’ hardstanding area, and as such one of their proposed mitigation measures will actually make the volume of intercepted rainfall greater. As before to support their statement solar panels do not increase storm run-off, they refer to out-dated research by Cook and McCuen published in 2013, which they advise concluded that full vegetation cover is required beneath the modules to make changes in run-off flows insignificant. As before the Applicant goes onto dismiss research by Pisinaras (2014) and Yavari (2022) which report increases in storm run-off, considering these results as inappropriate given the semi-arid environment the work was undertaken in.

It is very noticeable however, that the Applicant does not challenge the more recent research, referenced by ourselves in our July 2024 report letter, in this technical area, which provides consistent conclusions that solar panels increase peak run-off, increase total flows and increase erosion compared to the pre-development situation. This more recent research is considered to better represent the micro-hydrology of, and the interrelationship between, the solar panels, the below-panel shaded vegetation and the inter-panel access corridors. Whilst the above is a rather technical discussion, the concluding point is that contrary to the Applicant’s submissions, research shows that solar panels do increase storm rainfall run-off. Because the Applicant cannot demonstrate the vegetation solution has a guaranteed reliability and effectiveness up to a given design event (ie a regulator specified required 1 in 100 Year plus climate change return period), then the vegetation and filter strip mitigation measures cannot be considered to be reliable to maintain storm run-off at predevelopment levels up to and including 1 in 100 Year return period storms.

The consequence for the Applicant is that they will need to manage (capture, store and slowly release) the storm water rainfall run-off from nearly all 14km2 (1,400 hectares) of the

The Applicant accepts that ancillary infrastructure introduces impermeable surfaces requiring standard attenuation measures. These have been proposed in the form of gravel subbases, and ponds to accommodate the relevant 100-year plus climate change allowance, in line with national guidance and policy.

Regarding the solar panels, the Applicant’s position is based on evidence that well-managed vegetation beneath panels can maintain infiltration rates close to pre-development conditions, thereby minimizing increased runoff.

The Applicant recognizes the importance of infiltration testing to inform pond sizing, locations, and overall drainage design. A programme of site-specific infiltration testing will be undertaken as part of detailed design. Results from these tests will directly inform the detailed drainage designs, which will be prepared and submitted for approval post-consent as part of the certified detailed drainage strategy under DCO Requirement 9. This staged approach allows flexibility to optimize the design based on robust site data while ensuring at this stage conceptual drainage design complies with policy requirements to not increase peak flow or total runoff volumes compared to the pre-development situation.

In regard to recent technical studies on the impact of surface water runoff from solar panels, a separate technical note has been prepared and is submitted alongside DL2, as **EN010147/APP/12.2**: Appendix 2: Flood Risk Technical Note - Solar Panel Runoff v1.

		development that contains the 840 hectares of solar panels, as opposed to the 2.2 hectares they are proposing. This is a fundamental error on the part of the Applicant, which underestimates (if we assume hectares to be managed as a reasonable metric) surface water flood risk by almost 3 orders of magnitude. On this basis the application should be refused. Surface water management of this scale will require considerable land take, which will need to be outside of the river flood zones in order to be effective. It is not clear whether this is achievable on the site with the number of solar panels proposed and as such this questions the feasibility of the proposed development. Conversely if the Applicant choses to reduce the number of solar panels to accommodate the necessary surface water management infrastructure, this would presumably impact the cost effectiveness of the development and may result in the financial viability of the scheme becoming problematic. Additional Omissions and Concerns The below omissions and concerns were identified in our letter of July 2024. The Applicant's position on these issues has not changed since the PEIR reports, and therefore they are all repeated here again as they all remain valid: i) The wider site has at least 10 No. Ordinary Watercourses passing through the development land parcels and numerous more ancillary drainage routes. These demonstrate that surface water will also flow onto the site from land upslope of the solar panel land parcels. This issue has not been recognised by the Applicant, in large part because they do not recognise the need to manage surface water over the entire area with solar panels. It has not been demonstrated by the Applicant that all land areas draining onto the site can be routed around the development. Where they cannot, then such areas will contribute to overwhelming the on-site water management infrastructure, increasing downslope flood risk; ii) The construction phase is recognised by the Applicant as having an adverse impact on surface water run-off flood risk. They state this will be reliant on the Code of Construction Practice (CoCP) to ensure control of surface water run-off risk. However, the Outline CoCP which is now available, does not mention surface water drainage management, and states a Flood Management Plan will only be prepared prior to construction. It is therefore not only uncertain but impossible to currently assess the adequacy of the CoCP to manage this risk; iii) The Applicant recognises the need to not only attenuate construction phase storm run-off flows but also enable adequate treatment (most likely turbidity clarification). However, such treatment requires much slower flow rates than pre-development storm events and as such the amount of storm water retention on site during the construction phase had to be much greater than postconstruction. This does not appear to have been recognised by the Applicant. No details are provided on construction phase drainage, nor pollution control measures, which they advise are to be developed under the CoCP, including a Pollution Prevention Plan. It is therefore not only uncertain but impossible to currently assess the adequacy of the CoCP to manage this risk; iv) Accepting that the entire area containing the solar PVs needs to be managed to control its surface water management then it follows that for this development with dozens of Land Parcels each potentially flowing to more than one off-site micro-catchment that this will necessitate dozens of construction phase and operational phase retention basins and treatment facilities – each similar to those prosed for the Land Parcel adjacent to Cassington. There is no evidence to demonstrate that these issues have been adequately evaluated to confirm the construction of up to 2.2 million solar panels in a 14km2 area is feasible, nor that they can be adequately operated and maintained given operational phase flood risk and water quality risk management are to be detailed later in the Operational Management Plan.		
REP1-056	Cumnor Parish Council	Written Representation (WR) by Cumnor Parish Council	The Applicant notes Cumnor Parish Council's response to the ExA, including the status of the made Cumnor Neighbourhood Plan, its views on the effects of the Proposed Development and the adequacy of assessment of those effects, including cumulative impacts and those of the Red House Farm solar development. The Applicant's response to Cumnor Parish Council's detailed comments are provided elsewhere within the Applicant's response tables to the Written Representations.	Acknowledgement
REP1-062	Cumnor Parish Neighbourhood Plan - Important Views Report	In September 2018, the Neighbourhood Plan Steering Group commissioned Lepus Consulting to undertake a Landscape Character Assessment of the parish. Following careful analysis of landscape character in the NP area, 14 Landscape Character Areas (LCAs) were identified and assessments were made of landform, biodiversity and the natural environment, the built environment, community assets, important views and noise. Using the 14 LCAs and the broad description and featured viewpoints that emerged from this fieldwork, a group of volunteers from the community then undertook additional fieldwork to hone the viewpoints and views. The volunteers took photographs of key views identified in the Landscape Character Assessment study and described the direction, visual features and the extent of the view.	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment **[APP-045]**. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. The Landscape and Visual Impact Assessment **[APP-045]** has identified and acknowledged a number of significant effects upon visual amenity. Particularly from public rights of way. However,	Landscape and Visual Impacts

		After review by the Cumnor Neighbourhood Plan Steering Group this process identified 31 Important Views. These are listed below in Table 1 and shown on a map of the parish in Map 1. In examining the Reg14 consultation responses to the 31 proposed Important Views it is clear that there is widespread support from parishioners for the designation of these views, reflecting both the here and now - what they can see with the naked eye within the Parish and in some cases beyond the Parish too - and their historical significance, with a number of the views being the subject of works by internationally renowned artists, photographers and authors. Recognising that Important Views within a Neighbourhood Plan can only encompass views within the Plan area inevitably leaves the authors of this report with a dilemma: to describe a view by just referencing what can be seen within the Parish, and/or to describe it as a layperson would, including what can also be seen beyond the parish boundary, as any photo shows. To resolve this dilemma the Important Views below have been mapped and described to explain what makes them an Important View in a formal sense for a Neighbourhood Plan. Additionally, in relevant cases, where any observer would also be able see beyond the Parish boundary, and so photos show significant landmarks, these are also described.Given the elevation range across the Parish (60m to 165m2) there are a number of examples of this, of which three at high, mid and low elevations illustrate the point: • Important Views 12a, b and c, at an elevation of 146m, have extensive Important Views within the Parish. In addition, hills in Buckinghamshire at Stokenchurch (240m elevation) in the Chilterns AONB can be seen at a distance of 27.5km, along with hills to the north of Burford (195m elevation, 24km distance) in the Cotswolds AONB. • At a mid-elevation (125m) Important View 30 looks south across open farmland and woods within the Parish. Framing this Important View are views of the Berkshire Downs, south of Harwell and Wantage, at a distance of 22km, and further west, seen because of their elevation (215m). • At a low elevation (65m) Important View 20a looks across a Nature Reserve in the Parish. In the background, however, on the west side of the adjacent Thames in West Oxfordshire, the steeple of Stanton Harcourt Church can be seen at a distance of 2.5km. The identified important views are located in the report - for reference.	on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified, within the LVIA **[APP-045]**, at a very local level or where it would be difficult to entirely mitigate visual effects. In addition, proposed planting would have a longer-term benefit reinforcing the landscape character of the local landscape. The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Impact Assessment **[APP-045]**). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages **[APP-072 to 080]**. These were considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance **[APP-149]**. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA **[APP-045]**. Where possible, viewpoint locations were selected based on published important views, such as those identified in the Cumnor Parish Neighbourhood Plan Important Views Report (February 2021). As stated above, all viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects. Of those important views identified in REP1-062, it is noted that there is very limited potential intervisibility, as shown of the ZTV **[APP-085]**, to viewpoint 12a. Viewpoint 30 is focussed away from the Project to the south; and viewpoint 20a is focused to the west, similarly away from the Project. This demonstrates that not all the important views are relevant and have been discounted from the LVIA **[APP-045]**.	
REP1-063	Cumnor Parish Council	This document has been created by residents of Farmoor, and supports the overarching Character Assessment for Cumnor Parish. Farmoor is one of the four wards that make up Cumnor Parish. To create the content of this document contributors used a combination of desk top research, field observations and interviews with local residents. In order to assess the area fully, we split the area into three:- Tumbledown to Farmoor Reservoir (including Filchampstead), Tumbledown to BablockHythe and thirdly, the settlement of Farmoor. Please refer to document for further details.	Please refer to response for REP1-062 above.	Landscape and Visual Impacts
REP1-064	Cumnor Parish Council	Written Representation (WR) - Thames Valley Police Designing Out Crime Officer comments to Vale of White Horse District Council for Planning Application reference P25/V0269/FUL (Red House Farm)	The Applicant notes the response of the TVP 'Designing Out Crime' Officer, in respect of the Red House Solar Farm, as submitted by Cumnor Parish Council. The issues of Crime and Community Safety were considered at the scoping stage, as set out in Scoping Report [**APP-125**] Table 7.18 and Table 7.19. That analysis concluded that actual and perceived crime effects were unlikely, including during operation, and were therefore scoped out in line with proportionate assessment. Thames Valley Police and Crime Commissioner was consulted at the Scoping stage, and again at the PEIR and targeted consultation stages, along with the Thames Valley Local Resilience Forum, but no consultation responses were received. Similarly there was no Relevant Representation received from TVP post submission. Whilst the risk of theft, of materials and equipment, and of vandalism, cannot be completely avoided the Applicant is proposing security measures (fencing, infra-red sensors, and higher levels of protection for the project substations), as described in Table 6.4 of Chapter 6 of the ES [**APP-043**], that are considered proportionate and appropriate for the Project, and align with those measures usually deployed to protect solar farms.	Acknowledgement
REP1-067	Oxfordshire County Council	3.1.Oxfordshire County Council (OCC) would like the Examining Authority to consider Ecology and Biodiversity Net Gain (BNG) a Principal Issue throughout the examination. 3.2.In OCC's Relevant Representation **[RR-0793]** we outlined our concerns around the ecological surveys which had been carried out by the applicant, their assessment of the impacts on protected species and around their proposed mitigation. We also raised concerns around their assessment of the impact on Veteran Trees and Ancient Woodland (including two SSSI). 3.3.We also note that Cherwell District Council, Vale of the White Horse District Council, and West Oxfordshire District Council raised similar concerns in their Relevant Representations (**[RR-0164]**, **[RR1086]** and **[RR-1102]** respectively). 3.4.The Host Authorities will expand on these issues in a joint Local Impact Report to be submitted at Deadline 1. 3.5.Given the potential for significant impact on protected species, and priority habitats	3.1 Noted. 3.2/3.3 The Applicant's response to the Host Authorities' RRs was submitted at Deadline 1 **[REP1-020]**. 3.4 The Applicant's response to the LIR is set out within this document. 3.5 Noted.	Local Ecology and Nature

		Oxfordshire County Council would like the Examining Authority to consider Ecology and BNG a Principal Issue both throughout the examination and in the ExA's recommendation to the Secretary of State.		
REP1-076	Vale of White Horse District Council	Lack of clarity on NGET Substation / Grid Connection - Points 69 to 71 69. VWHDC remains concerned over the uncertainty of the requirements for the grid connections. This is a large and major component of the application, and www.whitehorsedc.gov.uk the expected infrastructure and grid connections associated with the project must be fully assessed. To date, information provided by the applicant about the appearance of the grid connection and the NGET substation design is not acceptable. 70. Given grid connection is anticipated to be in October 2028, full design details and who will deliver it must be known by now and should be made public for assessment. 71. The NGET substation is anticipated to be very large and sited somewhere in or adjacent to the southern parcel substation and its scale is unlike anything else in this area and will likely have to rely heavily on topography to reduce its impact.	Details of the Bilateral Connection Agreement between NGET and SolarFive Ltd can be found in the Grid Connection Statement **[APP-019]** The Applicant has been working closely with NGET for two years and is confident that the substation will be constructed in time for Botley West and three other connection customers to connect at Farmoor. 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.	Grid Connection
REP1-076	Vale of White Horse District Council	Points 56 to 65 - Heritage Impacts VHWDC confirm there will be no direct physical impact on any designated heritage asset from the proposed development. However, heritage assets are understood in relation to their existing rural and agricultural landscape setting, where harmful impacts of the proposed development on the significance of the heritage assets will occur. Given the size of the area and the scale of the change to the agricultural character of the area which forms the setting of these assets VWHDC considers the level of harm sits centrally within the less than substantial harm spectrum. The proposed development would result in the loss of the ability to appreciate heritage assets in their agricultural setting over a wide area, particularly when experienced from walking Public Rights of Way. VWHDC remains of the view that the loss of the rural, agricultural character which forms part of the setting of designated heritage assets and contributes to the understanding and experience of those assets is not outweighed by the benefits of the proposed development. 64. The proposed development is contrary to policies CP39, DP36, DP37 and DP38 of the Development Plan and to National Policy. 65. The Southern Site area should be removed entirely from the proposed development.	The Applicant notes the points made by VWHDC. The Applicant agrees that all harm to the significance of designated heritage assets is less than substantial. As such the policy test is the one set out in paragraph 5.9.32 of NPS EN-1 (the Overarching National Policy Statement for Energy), which uses almost the same wording as paragraph 215 of the NPPF as quoted by VWHDC. Essentially the less than substantial harm to the significance of designated heritage assets should be weighed against the public benefits of the proposed development. In this context, the Applicant would refer to paragraph 2.3.8 of NPS EN-3 (the National Policy Statement for Renewable Energy Infrastructure). This section of the policy addresses national designations and states '*In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target*'. The Applicant considers that the public benefits of the Proposed Development outweigh the less than substantial harm to the significance of designated heritage assets.	Historic Environment
REP1-076	Vale of White Horse District Council	Best and Most Versatile (BMW) Agricultural Land 37. BMV land is assessed in the LIR, but at least 4ha of BMV will be permanently lost through siting of the NGET substation. VWHDC consider this weighs against the proposed development as land with a lower value of classification could be used to site a substation. 38. The proposed development is contrary to policy CP43 of the Development Plan which seeks to avoid developing the best and most versatile agricultural land preferring use of areas of poorer quality land in preference to that of higher quality.	The Applicant has sought to, as far as possible, avoid permanent impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 **[APP-042]**). The approach to the consideration of planning, environmental and other relevant considerations in relation to the substation location is provided in ES Chapter 5: Alternatives considered **[APP-042]**, Only 5.5 ha of BMV land would be permanently lost during construction, including the substation areas, which is not significant in EIA terms (ES Chapter 17 **[APP-054]**, paragraph 17.9.6).	Agricultural Land Use
REP1-076	Vale of White Horse District Council	Points 39 to 55 - Landscape and Visual Impact: 39. National guidance confirms planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils 40. NPS EN-1 recognises that virtually all nationally significant infrastructure projects will have adverse impacts on the landscape, but there may also be beneficial landscape character impacts arising from mitigation. 41. VWHDC remains of the opinion that proposed development on the Southern Site will result in a significant negative change causing harm to landscape character, both within the wider setting and to the rural landscape setting of Cumnor Parish. 46. The LCA indicates that key positive attributes to be conserved and enhanced include the views across the low-lying landscape, the network of public rights of way and the rural backdrop in views. 47. The landscape strategy is to maintain the open character of farmland which forms gaps between individual settlements, conserve woodlands, hedges and riparian vegetation which give the ridge its treed character, protect remaining semi-natural habitats and resist further urbanising sprawl of low-density development. 49. The proposed development would result in the loss of key features of the landscape and would introduce elements uncharacteristic with these character areas. The development would erode the context of existing features and their perception within the landscape and mitigation	Please refer to Applicant's response to **[REP1-072]** in **[EN010147/APP/12.3]**. 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. 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 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.*	Landscape and Visual Impacts

		measures would not reverse the loss despite delivering some localised benefits. This would result in a major to moderate landscape effect that is significant. 50. It is also considered that for many of the views, the magnitude of visual change would be higher than as stated in the applicant's LVIA, with proposed development causing a dominant or complete change or contrast to the view, resulting from the loss or addition of substantial features that will substantially alter the appreciation of the view. 51. In terms of mitigation, whilst hedge planting may in time screen solar panels and associated infrastructure in some local views, hedges would need to be tall and would also block views which are important to the open nature of the landscape and to the appreciation of the vale location, the views from the higher ground are not substantially changed as the mitigation matures. Proposed steel mesh fencing and numerous cameras would also be entirely at odds with the rural setting and would add to the adverse impacts on rural character. 52. Overall, VWHDC consider it is not possible to locate solar development in this landscape setting without significant adverse effects on the landscape character and views. This is a rural, relatively unsettled area, with a keen sense of place, contained by the slopes to the north and south. 53. The proposals therefore would be contrary to policy CP41 of the Local Plan, which supports renewable energy development provided it does not cause a significant adverse effect to the landscape. The development would also be contrary to policy CP44 which seeks to protect the landscape including important views and tranquillity. 54. VWHDC consider that the benefits of the proposed development are insufficient to outweigh the landscape harm and policy conflicts identified. 55. The Southern Site area should be removed entirely from the proposed development.	*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).	
REP1-076	Vale of White Horse District Council	Inappropriate Development in the Oxford Green Belt: 15. It has been established that due to the size and nature of the development, the proposed solar farm is inappropriate development in the Oxford Green Belt. 16. Inappropriate development in the Oxford Green Belt is, by definition, harmful and carries substantial weight. In addition to harm caused by reason of inappropriateness, development can have further harm to the Green Belt by reducing openness (which includes visual as well as spatial considerations) conflicting with the fundamental aim of keeping such land permanently open. 17. National policy is clear therefore, that for this DCO application to be successful, there must exist Very Special Circumstances (VSC) to justify the use of Green Belt land. 27. The second point of PPG guidance on Green Belts considers duration. The proposed development is to be operational for a period of 37 years with solar panels located on either side of rights of way for extensive lengths to have a significant impact on openness and tranquillity, at the very least for a generation. 28. In support of this assertion an Inspector dismissed an appeal for a solar farm in the Green Belt stating “I acknowledge the appellant's argument that the proposal is temporary in nature (40 years) and that the development would be removed and the land restored to its former condition – in essence openness would be restored at that point. Leaving aside the discussion as to what may happen at the end of the 40-year period – which can only be speculation - I do not find this argument to be persuasive in terms of reducing the effect on Green Belt openness. Although the proposal is for a limited period, the length of that period is very substantial. But even more importantly, the fundamental aim of national Green Belt policy is to prevent urban sprawl by keeping land permanently open. With that well established policy background 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.” 29. The proposed development would also result in the permanent development of 4ha covered by buildings for the NGET substation, a form of development, urban in scale and appearance.	In paragraphs 12 to 36 the Vale have not weighed into the planning balance the clear National Policy in respect of Critical National Priority (CNP) infrastructure in Green Belt. i.e. the overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. “...the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test...” The absence of this reference and how the authority interpret that, skews their current analysis and therefore the conclusion they should have reached in the Applicant's view. Notwithstanding, the Applicant has set out its VSC case reinforcing the assumption in national policy that the VSC is met **[REP1-012]**. In addition, the very factors cited by the authority in paragraph 31 which they say inspectors and LPA's have considered as VSC in the Green Belt are the very factors that Botley West enjoys i.e. *-the contribution a solar farm would make towards renewable energy targets* *- the well screened nature of a site* *- limited harm to the surrounding landscape* *- where harm is temporary* *- visual impact mitigated by planting* *- the proximity to a substation with capacity* *- the benefits of the production of renewable energy along with the temporary nature of the development outweighed the harm to the Green Belt.* The Applicant agrees with the authority in the factors it lists as the VSC weighing in favour of the Project, but the Applicant considers the full list to be that set out below: VSC 1 - Meeting the urgent need for secure, clean, renewable energy; VSC 2 - Overall compliance with relevant NPS and relevant parts of approved and emerging plans; VSC 3 – Renewable energy to power the equivalent of 330,000 homes; VSC 4 - Biodiversity Net Gain; VSC 5 – Economic, Educational and Sustainability Benefits; □ VSC 6 - Landscape and Access legacy; These are described in detail at Appendix 8 to the Applicants Planning Supporting Statement The Applicant, however, does accept some harm will be caused to Green Belt and landscape but despite the quote from an appeal quoted by the authority in paragraph 28, the Applicant is of the firm view the harm is limited and temporary and reversible.	Green Belt

			The authority believe that the Southern Site should be removed from the development completely. The Applicant's view is that whilst part of the land is on a slope, it can be adequately mitigated through landscaping proposals and onward management of existing and new landscape planting.	
REP1-076	Vale of White Horse District Council	Points 72 to 73 - Local Policy Compliance: 72. Whilst not determinative under the Planning Act 2008, the Examining Authority can consider other important and relevant matters, including national and local planning policy. The local policies that VWHDC considers of relevance to this application are set out in the Council's RR **[RR-1086]** and should be considered as important and relevant to the determination of the application. 73. VWHDC considers the proposed development conflicts with the following policies: CP13 – The Oxford Green Belt CP41 – Renewable Energy CP44 – Landscape DP31 – Protection of Public Rights of Way, National Trails and Open Access Areas DBC4 – Development in the Green Belt DBC7 – Important Views TI3 – Footpaths and Bridleways CP39 – The Historic Environment DP36 – Heritage Assets DP37 – Conservation Areas DP38 – Listed buildings	The Applicant's response to the policies the authority say it is in conflict with is summarised in Appendix 6 of its Planning Supporting Statement **[REP1-012]**. 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 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]**.	Planning Policy
REP1-076	Vale of White Horse District Council	Points 74 to 78 - Planning Balance 76. To aid the ExA, VWHDC provides the following consideration of harms v benefits of the proposed development and the weight to accord to each on the following scale: full weight, very significant weight, significant weight, moderate weight, limited weight, no weight. Harms 77. VWHDC attach very significant weight to the fact that the development is inappropriate development in the Green Belt. Further significant weight is attached to the harm caused by the development to the openness because of the presence of structures on land that is currently agricultural and free from obstruction. Very significant weight is also given to the landscape and visual harm caused by the development. Harms identified to heritage assets further weigh negatively against the proposed development, and moderate weight is attributed to that harm. Limited weight is given to the loss of agricultural land. The impact on the footpaths without appropriate mitigation is given moderate weight. Benefits 78. In favour of the proposed development, very significant weight is attributed to the need to provide additional energy from renewable sources and the considerable wider environmental benefits associated with increased production from renewable sources as set out in detail above. Limited weight is given to the time limited and non-permanent nature of the installation, as the suggested lifespan of 37 years is a significant period, and elements of the proposed development will remain permanent. The decommissioning of the infrastructure would allow a return to farmland. Moderate weight is also given to the ecological enhancements proposed. No weight is attributed to the landscaping of the proposed development.	The Applicant for the Botley West CNP infrastructure has shown how their application meets the requirements in NPS EN-1 and EN-3. In identifying then assessing impacts and effects they have applied the mitigation hierarchy to avoid or minimise/mitigate effects. These are reported in the Applicant's Environmental Statement. Indeed the Applicant continues to apply the mitigation hierarchy evidenced in their ongoing discussion and engagement with consultees, some of which will reveal themselves in the Applicants second Change Request application to PINs. The authority state at paragraph 75 that '*Paragraph 4.2.14 of NPS EN-1 confirms the Secretary of State will consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis'*. This is correct but the authority then neglect to mention the next element of that same paragraph. That states that, '*The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above* [i.e. Meeting the requirement of the NPS's] *have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions set out below apply.'* Whilst the authority does not appear to dispute that the Applicant has indeed met the NPS requirements, it then, without reason, does not acknowledge the CNP presumptions that then apply to such CNP infrastructure. The Applicant respectfully suggests this is an important omission in the authority's assessment of the planning balance set out in paragraphs 74 to 78 of their representations. The harm v benefit analysis set out omits the positive influence that the presumption afforded to CNP infrastructure benefits from.	Planning Policy
REP1-081	West Oxfordshire District Council	WODC recognise that the proposed development has been restricted in areas at risk of fluvial flooding, but have previously highlighted concerns about surface water drainage to the north of Cassington **[RR-1102]**. The village of Cassington is 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. The existing issue of surface water drainage is recognised in evidence prepared by the Applicant and this will require careful consideration through project design, to reduce and not increase the flooding risks to people and property in proximity to the scheme. The development proposals 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 of proposals needs to be undertaken, to confirm the effectiveness of these measures to mitigate flood risk. The proposed development relies on the construction and operational 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 included	We recognise the existing surface water issues at Cassington. While no off-site mitigation is required through the DCO and planning policies, the Applicant has sought to understand existing flood risk issues at Cassington. The Outline Landscape and Ecology Management Plan **[APP-235]** and 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. With regard to inspection and maintenance, 7.6.2 - Outline Operational Management Plan [**APP-234**] details requirements for inspection and maintenance. There will be regular inspection and maintenance of the drainage systems, proposed Sustainable Drainage Systems (SuDS), drainage outfalls and watercourse crossings. This will be carried out in accordance with a detailed maintenance plan developed at the detailed design stage prior to construction.	Hydrology and Flood risk

		in the application require significant information and calculation to confirm their acceptability. The Council requires information on how the land management, particularly during the operation will address any issues around sheeting off the solar panels to reduce bare ground and channelling of water in any specific way. The inspection and maintenance regime is key to mitigating any potential effects and must be included in any operational plans. Red areas on Map 6 (Score 3) indicate land parcels that include areas of flood zone 2 which in most cases are already excluded from development. Orange areas (Score 2) are areas recognised as being at risk of surface water flooding, where development may create additional risk to existing properties. Green Areas (Score 1) are areas at less risk of flooding.		
REP1-081	West Oxfordshire District Council	The Council recognises that the scale and location of the proposed development has been dictated by the availability of land and a suitable grid connection. The Applicant has stated that they consider it rational to propose a scheme which delivers the greatest possible decarbonisation and energy security benefit from the available land and available grid connection **[PDB-014]** and that this is the approach which the Applicant has taken to the location and design of the Project. WODC consider that a more nuanced informed and data-led approach is required and in that regard that the scale of the proposed development should be substantially reduced to address the harmful impacts of the scheme.	A data-led, evidence-based approach has been applied throughout the project's design and assessment. The Environmental Statement includes detailed studies across landscape, heritage, ecology, climate, and socioeconomics to assess impacts and guide mitigation. This has led to substantial refinements to the scheme, including reduced development area, repositioned infrastructure, and the incorporation of buffers, biodiversity zones, and land for community and agricultural use. The approach seeks to balance minimisation of impacts with the delivery of large-scale renewable energy in line with national policy objectives. This is supported by the Change Request Notification submitted by the Applicant alongside the Deadline 2 submission, where the Applicant is seeking further refinements and reductions in response to ongoing design work and stakeholder engagement. Large-scale solar installations represent one of the most effective ways to generate clean electricity while using relatively little land. Such projects are typically located in rural areas, where suitable land is more widely available and conditions like solar irradiance and grid access are more easily met. This is supported by National Policy. For example, Part 3 of NPS EN-1 explains the urgent need for significant amounts of large-scale energy infrastructure in meeting government's energy objectives.	Project description and Design Parameters
REP1-081	West Oxfordshire District Council	We are of the view that the extent and magnitude of the harms arising from the proposed development have been underplayed by the Applicant, in that they have been characterised as 'temporary' or 'not significant' for a range of impacts. The length of time that the development would be in place, coupled with the ongoing impacts post development (e.g. of the screen planting and ability to fully decommission elements of the scheme) are such that the Council questions aspects of the project assessment methodology.	The Environmental Statement reports the overall level and nature of adverse effects, resulting from the construction, operation and decommissioning. Their degree of harm, including in terms of residual effects, is considered within the Environmental Statement, and a Summary of Significant Effects is provided within Chapter 21 **[APP-058]**. A number of measures have been embedded within the design of the Project to mitigate potential adverse environmental effects. Where required, further mitigation measures are identified within topic chapters. These are measures that could further prevent, reduce and, where possible, offset adverse effects on the environment. Residual effects are defined as those effects that remain following the implementation of mitigation measures (embedded mitigation and where applicable additional mitigation). Table 21.1 of Chapter 21 **[APP-058]** sets out the significant residual and cumulative effects during the construction, operation and maintenance, and decommissioning of the Project.	Summary of Significant Effects
REP1-081	West Oxfordshire District Council	WODC's assessment of ecological impacts arising from the proposed development is detailed in the Local Impact Report. The LIR identifies a range of predominantly negative impacts to protected habitats and species across the project area which will likely require further mitigation, enhancement or changes to the project, in order to avoid or minimise harms. These include impacts on bat populations, aquatic mammals and great crested newts, for which inadequate survey work has been undertaken by the Applicant and impacts on farmland birds and Ancient Woodlands, for which inadequate mitigation of impacts is currently provided. We also have a more general concern about the fenced enclosures limiting the ability of all landbased wildlife to roam and migrate. WODC consider that the project should be modified to deliver further enhancement to trees and woodlands which would deliver additional benefits for protected species to offset harms generated elsewhere. 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. WODC consider that a minimum 50m buffer adjacent to Ancient Woodlands would reduce the impact of edge effects of the proposed development and contribute to the protection of Annex II bat species associated with woodland (maternity roosts for both Bechstein's and Barbastelle bats). Ideally however, opportunities should be sought to connect areas of woodland and contribute to the aims of the emerging Local Nature Recovery Strategy (see Map 5). More appropriate mitigation for the impact on farmland birds needs to be provided within the project, as the proposed provision of skylark plots is inadequate and will likely result in the displacement of farmland birds to the periphery of the development or more open areas within the project. There may be opportunities to manage areas of archaeological interest for the benefit of farmland birds if such areas are to be excluded from development. Red areas on Map 6 (Score 3) indicate areas of the proposed development that must be removed to mitigate the impacts on important ecological features and to improve ecological connectivity through the landscape. Orange areas (Score 2) indicate	Noted. The Applicant's response to the LIR is set out below.	Local Ecology and Nature

		where enhanced mitigation is likely to be required to mitigate impacts on protected species, particularly farmland birds.		
REP1-081	West Oxfordshire District Council	There has been no meaningful engagement by the Applicant to seek to address issues as they have arisen and the Council regrets this as it entered this process as a willing participant seeking to secure an acceptable scheme.	The Applicant acknowledges this comment but confirms that the level of consultation undertaken, and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in the Consultation Report **[APP-024]** and confirmed in the Acceptance checklist (s55) **[PD-001]** and Notification of Decision to Accept Application **[PD-002]**, which was submitted to the Planning Inspectorate and accepted for examination. For example, as described in Chapter 2 **[APP-024]**, the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development. The Applicant contacted officers and political leaders from local authorities based on the administrative boundaries for the proposed Project on 15 August 2022, ahead of publicly introducing the Project and prior to any formal consultation. The Applicant has worked with host Local Planning Authorities, from the phase one non-statutory consultation stage through to submission, under the auspices of a Planning Performance Agreement, and the Applicant expects to develop further the draft Statements of Common Ground, which have already been shared with local planning authorities, for agreement as part of the examination. The Applicant considers ongoing non-statutory engagement with consultees including local planning authorities to have enabled two-way dialogue between the Applicant and consultees on Project updates and allowed the Applicant to continuously consider consultee feedback in the iterative design of the Project.	Consultation Process
REP1-081	West Oxfordshire District Council	The Council have consistently identified areas of the proposed development that should be removed from the project, particularly areas proposed for panel coverage, in order to reduce harms to landscape, heritage and soil resources. The Council have prepared a series of maps to more clearly identify the parts of the proposed development where the harmful impacts are likely to be most significant and to communicate these to the Examining Authority. It should be noted however that with a more detailed and informed analysis, some parts of the plots identified as unsuitable may be capable of more limited development than currently proposed and conversely some parts of the plots identified as suitable may need to be reduced in scale.	The Applicant acknowledges the map prepared by WODC that shows their understanding of which land parcels contribute most to the setting and significance of heritage assets. The selection of land for the Proposed Development has taken account of many factors, including the likely impact on the significance of heritage assets. This process is ongoing, with proposed changes to the design of the Project being brought forward in Change Request Notification 2 which the Applicant intends to submit at Deadline 2. These respond to comments from consultees and include changes that will avoid or further reduce impacts on heritage assets. 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
REP1-081	West Oxfordshire District Council	The Council have consistently identified areas of the proposed development that should be removed from the project, particularly areas proposed for panel coverage, in order to reduce harms to landscape, heritage and soil resources. The Council have prepared a series of maps to more clearly identify the parts of the proposed development where the harmful impacts are likely to be most significant and to communicate these to the Examining Authority. It should be noted however that with a more detailed and informed analysis, some parts of the plots identified as unsuitable may be capable of more limited development than currently proposed and conversely some parts of the plots identified as suitable may need to be reduced in scale.	The Applicant notes this information.	Agricultural Land Use
REP1-081	West Oxfordshire District Council	Significant areas of best and most versatile (BMV) agricultural land would be taken up by panel development and permanently lost in the case of the grid connection substation. National Policy Statements state that solar development should avoid “the use of Best and Most Versatile agricultural land where possible”. It goes on to define BMV land as those in Grades 1, 2 and 3a of the Agricultural Land Classification. For developments in West Oxfordshire, the Council require that all development proposals are required to show consideration of efficient and prudent use of natural resources, including minimising their use on the soil resource. Any proposals for a solar farm involving BMV agricultural land would need to be justified by the most compelling evidence which demonstrates why poorer quality land has not been used in preference to best and most versatile agricultural land. The applicant’s mapping of BMV 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% of the land proposed for solar PV would be sited BMV agricultural land. With more careful selection of sites such extensive loss could have been avoided. WODC request that areas of BMV agricultural land should be removed from the project in order to protect the soil resource and to avoid any long term issues that may impact the quality of the soil resource such as inadequate decommissioning and remediation at the end of the project. Map 7 shows land parcels with high concentrations and coverage of best and most versatile agricultural land shaded red (Score 3). Parcels with low coverage or no indication of best and most versatile agricultural and are shaded green (Score 1).	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

REP1-081	West Oxfordshire District Council	17. WODC's concerns relating to the impact on the historic environment primarily relate to changes within the setting of important heritage assets. 18. The Botley West scheme proposals are spread over a large expanse of the Oxfordshire countryside, which contains assets of the highest significance, including international designation of the World Heritage Site (WHS) at Blenheim Palace. 19. As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration needs to be given to the impact of large-scale solar farms which depending on their scale, design and prominence, have the potential to cause substantial harm to the setting of heritage assets. Paragraph 112 of the Operational Guidelines for the Implementation of the World Heritage Convention 2015 points out that the broader setting of a WHS must be conserved to provide support to the Outstanding Universal Value of the Site: 'An integrated approach to planning and management is essential to guide the evolution of properties over time and to ensure maintenance of all aspects of their Outstanding Universal Value. This approach goes beyond the property to include any buffer zone(s) as well as the broader setting. The broader setting may relate to the property's topography, natural and built environment and other elements such as infrastructure, land use patterns, spatial organisation and visual relationships. It may also include related social and cultural practices, economic processes and other intangible dimensions of heritage such as perceptions and associations. Management of the broader setting is related to its role in supporting the Outstanding Universal Value'. 20. In that regard WODC have considered which land parcels contribute most to the setting and significance of heritage assets, with particular regard to Blenheim Palace World Heritage Site, the Grade 1 Listed Buildings at Cassington and Church Hanborough and Conservations Areas at Wootton, Bladon, Church Hanborough and Cassington. The wider setting of these heritage assets include the topography, natural and built environment, land use and visual relationships, social and cultural practices. Such elements define the landscape character of the District and the Council consider that fundamental changes to the landscape character will therefore harm heritage assets of the highest significance. 21. Map 3 below indicates the land parcels that we consider contribute most significantly to the setting of heritage assets. Red parcels (Score 3) are those within or directly adjacent to a heritage asset, where development would have a direct impact on the setting of an asset. Orange parcels (Score 2) are those where the setting of a significant asset can be viewed from the surrounding countryside and where development would impact the landscape setting of an asset. Green Parcels (Score 1) form part of the wider countryside setting of heritage assets, but the topography of the countryside in these locations reduces the contribution that these parcels make to the setting of the assets.	The Applicant acknowledges the map prepared by WODC that shows their understanding of which land parcels contribute most to the setting and significance of heritage assets. The selection of land for the Project has taken account of many factors, including the likely impact on the significance of heritage assets. This process is ongoing, with proposed changes to the design of the Project being brought forward asset out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2. These respond to comments from consultees and include changes that will avoid or further reduce impacts on heritage assets. The Applicant considers that the assessment of impacts and effects as set out in the DCO application submission documents and any subsequent revised versions of such documents is robust and accurate.	World Heritage
REP1-081	West Oxfordshire District Council	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. The Applicant has assessed the impacts on noise sensitive receptors in proximity to the proposed development (primarily residential properties neighbouring the site) but it is not clear that the assessment extends to users of the public rights of way network and associated impacts on the tranquillity of the countryside. The modelled noise emissions levels for Power Converter Station (PCS) units are 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 long term 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. 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. The Council consider that noise impacts of the project will have a significant detrimental impact on the environmental quality and amenity of the countryside, particularly in proximity to public rights of way, contrary to Local Policy.	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]** The assessment considers the potential noise and vibration 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 and significant adverse effects are avoided. WODC make a number of points about the quantity of PCS units, and the sound level at 10m distance. Furthermore, the PCS units are distributed across the whole site, and no PCS unit is located within 10m of any receptors. The baseline survey has been undertaken so as to capture a representative background and ambient sound level at each receptor. This includes some receptors which are clocated adjacent to main roads.	Noise and Vibration Impact
REP1-081	West Oxfordshire District Council	The proposals, as a result of their scale and intervisibility, would fundamentally alter the landscape character over a significant area. The landscape is currently recognised as being of particular quality and sensitivity to change, and the visual impact of extensive screening measures will last well beyond the lifetime of the project.	Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. 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.	Landscape and Visual Impacts

Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape, such as much of Dornford Lane (PRoW 416/11/30) which oases through the middle 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

REP1-081	West Oxfordshire District Council	The Council have consistently identified areas of the proposed development that should be removed from the project, particularly areas proposed for panel coverage, in order to reduce harms to landscape, heritage and soil resources. The Council have prepared a series of maps to more clearly identify the parts of the proposed development where the harmful impacts are likely to be most significant and to communicate these to the Examining Authority. It should be noted however that with a more detailed and informed analysis, some parts of the plots identified as unsuitable may be capable of more limited development than currently proposed and conversely some parts of the plots identified as suitable may need to be reduced in scale.	The Applicant understands the concerns of the OHAs and looks forward to receiving the maps showing the areas suggested for removal.	Landscape and Visual Impacts
REP1-081	West Oxfordshire District Council	WODC consider that a proposed development at this scale will fundamentally change the landscape character of the area from rural, arable fields to a semi-industrial landscape for the lifetime of the project. The screen planting proposed to screen the solar farm will impact on the character of the area well beyond the lifetime of the project A landscape plan aimed at hiding the panels does not equate to mitigation and the legacy beyond the lifetime of the project is a major missed opportunity to secure landscape scale improvements, The Council consider that the Applicant's assessment of landscape impacts significantly underestimates the impact on local landscape character and views. WODC seek to conserve and enhance the quality, character and distinctiveness of West Oxfordshire's natural environment, including its landscape, cultural and historic value, tranquillity, geology, countryside, soil and biodiversity. Enhancements to such features require mechanisms to ensure regular and ongoing maintenance, including beyond the lifespan of the project. We provide a detailed description of how and where we consider the impacts on the landscape to be understated in the Local Impact Report and the concerns we have with the Applicant's methodology for assessing impacts. Our Written Representation seeks to draw the Examining Authority's attention to those areas of the proposed development where the landscape impact is most significant, and where removal of development from land parcels would reduce the landscape impacts of the proposed scheme. Areas indicated in red on Map 4 (Score 3) indicate areas of exposed, elevated and sloping land where the proposed development will be more prominent in the landscape. The council requests that these areas land parcels should be excluded from development to minimise harm to the landscape character of the area. Other areas, indicated in orange on Map 4 (Score 2) show where the landscape impact will be less than severe, but the cumulative impact will nonetheless	The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection offer. The Project will have an anticipated generation capacity of approximately 840 MWe (AC output - total installed capacity approximately 936,000 kVA), which will provide secure and clean energy to the equivalent of approximately 330,000 homes. When viewed on plan, the scale and land use of the Projects is proportionate to the amount of energy it generates as a Nationally Significant Infrastructure Project scale appears to be substantial. However, when viewed from the ground, because of the spread-out nature of the three separate Project sites, there will be no location from where the Project will be visible in its entirety. Rather, public rights of way users, for example, will have transitory glimpses of views to parts of it. The Landscape and Visual Impact Assessment **[PDB-006]** has identified and acknowledged a number of significant effects upon visual amenity, including. Particularly from public rights of way. However, on balance it is considered that the quality and character of the landscape and visual resources would largely be maintained and would have the capacity to accommodate the Project without significant effects beyond those identified. There would be significant effects on users of public rights of way within or immediately adjacent to the Project during operation and maintenance, at completion. By Year 15, once planting matures, these effects would not be significant. Designed-in mitigation, as shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**, includes supplementing existing vegetation as well as and new planting including new hedgerows, trees and woodland. This over time, along with substantial areas of existing new woodland planting, would break up the overall scale of the Project within views, over time. Low-lying solar panels following the existing contours, along with	Landscape and Visual Impacts

		reduce the attractiveness of the area for outdoor recreation and tourism. In addition to the impacts of the proposal on the landscape character of the area, the proposed development will result in significant visual impacts on sensitive receptors, primarily users of the public rights of way network (PRoW) across the project area. The development will, by its scale and nature, adversely affect the experience of PRoW users travelling through the area. In many locations, PRoW users will either travel between large areas of solar infrastructure or walk through corridors of hedgerows or tree belts with no, or very limited, views of the surrounding landscape. The Applicant has proposed a range of mitigation measures including planting of hedgerows to screen views of the solar farm from the wider countryside. The Council consider that the removal of panels from land parcels adjacent to public rights of way will be much more beneficial in reducing the visual impacts of the proposed development and protecting views of the wider countryside. The Council consider that in its current form, the proposed development would significantly detrimentally impact the public rights of way network across the project area both in terms of landscape and visual harm and the degradation of routes for the benefit of the local community.	gaps between rows and available views under the panels, would further reduce the absolute visual effects of the Project. In summary, viewpoints form PRoWs present the following: • All close-proximity views illustrate a good setback of the low-lying development from the PRoWs • Solar panels will appear mainly in transient, oblique views along a short section of the routes • Solar panels will not form a skyline feature. The existing landscape features take prominence • The closest parts of the development would occupy a limited angle of the view • Solar panels do not appear as prominent features. Please also refer to the Applicant's response to Question 1.14.10 of the ExA's First Written Questions.	
REP1-081	West Oxfordshire District Council	The majority of the proposed development within West Oxfordshire is situated in the Oxford Green Belt. The Council considers that due to the scale of the proposed development and the homogenous nature of the scheme that the proposal represents inappropriate development in the Green Belt, affecting both the visual and spatial openness of the Green Belt.nappropriate development in the Oxford Green Belt is, by definition, harmful and carries very substantial weight. The duration of the impact of the project will extend well beyond its 40-year life owing to the extensive alterations to the landscape caused by the screening measures proposed. Very Special Circumstances are not sufficient to outweigh the harm.	See Applicant's response to REP1-076 above. Again, the WODC have not weighed into the planning balance the clear National Policy in respect of Critical National Priority (CNP) infrastructure in Green Belt. i.e. the overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. "...the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test..." The absence of this reference and how the authority interpret that, distorts their current analysis and therefore the conclusion they have reached in the Applicant's view. Notwithstanding, the Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm **[REP1-012]**. At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. Not all of the Project falls within the Green Belt. Not all of the Project that is within the Green Belt is inappropriate either. That VSC approach and weight to be attached to relevant factors accords with the requirements of NPS EN-1 section 5.11 and, in particular, para 5.11.37	Green Belt
REP1-082	Defence Infrastructure Organisation	Glint and Glare The proposed solar development has the potential to produce glint and/or glare to military aircraft operating within the airspace surrounding RAF Weston on the Green. The introduction of sources of glint and glare beneath this airspace could create a hazard to aircraft by dazzling pilots at critical stages of flight. In the MOD's response to the Scoping Report dated 8th February 2023, we advised that due to the proximity of the solar array to RAF Weston on the Green, a glint and glare assessment will need to be submitted for the MOD to assess. As part of the application, a Glint and Glare assessment has been submitted. Whilst RAF Weston on the Green is listed as a relevant aviation receptor in the report, no detailed modelling has been undertaken as the report states no significant impacts are predicted. Due to military aircraft overflying the development sites, and as previously advised in our Scoping response, the MOD does require a glint and glare assessment for RAF Weston on the Green.	It is industry standard and best-practice to assess Glint and Glare towards aviation receptors in line with FAA 2013 guidance. This guidance requires consideration of 2-mile approach paths and the ATC tower. The LVIA methodology has been developed through engagement with consultees and consideration of the Scoping Opinion issued by PINS. In this case, due to the distance between the proposed solar panel areas and RAF Weston on the Green, it is considered that it is not possible for glare to be greater than 'low potential for temporary after-image', which would constitute a low impact, which would not require mitigation.	Aviation
REP1-085	Historic England	Gaps in, and sufficiency of, the information submitted as part of the DCO application: 1.16 In our view further information is required to demonstrate that the historic environment has been adequately assessed and considered in the development of this DCO application. a) The Heritage Impact Assessment (HIA) currently does not refer to or address the ICOMOS Technical Reviews. In its report, ICOMOS expressed its concern, based on the information that was available at the time, about the proposal's potential impact on the property's OUV due to the change it assessed in the character of the surrounding landscape. b) The HIA has yet to provide sufficient information to evidence and justify the conclusions drawn. The HIA identifies that the development would negatively impact an attribute of OUV (Appendix 7.4 HIA 1.6.3). However, because it has not fully undertaken its own assessment of the relationships between parts of the property's setting and its OUV, the conclusions are not specific about which parts of the development site would cause harm to OUV. As a result it is not clear how the impacts to this attribute to OUV have been minimised, and why they couldn't be avoided. c) Similarly, there is need for a more structured assessment of the types of potential impacts and the elements of the proposed scheme, from excavation of archaeological remains to installation of security fencing, the noise of	The comments made by ICOMOS in their Technical Reviews will be addressed in the next iteration of the Heritage Impact Assessment. This assessment report will also address the other comments from Historic England on the current iteration **[APP-141]** and will respond to any changes to the design of the Proposed Development following the Examining Authority's consideration of Change Request Notification 2 which the Applicant intends to submit at Deadline 2. The Applicant has agreed a number of additional visualisations for heritage assessment purposes with Historic England. The Viewpoint locations and the photomontages established for these Viewpoints are set out in the document Additional Photomontages for Historic Environment Assessment [**EN010147/APP/12.7**] submitted at Deadline 2. Night-time visualisations are not necessary as the Proposed Development does not include night-time lighting other than motion sensor activated security/emergency lighting, meaning light spill is anticipated to be minimal and infrequent. This is set out in ES Chapter 6: Project Description **[APP-043]**. The Applicant respectfully disagrees with the view of Historic England that the significance of effects on heritage assets as set out in the Settings Assessment **[APP-142]** have been downplayed. The Applicant considers that the assessment of impacts and effects as set out in the Revision 1 version of the Settings Assessment **[EN010147/APP/6.5]** submitted at Deadline 2 is robust and accurate.	Historic Environment

		construction traffic and the impact of security or other lighting (as partially summarised at 1.4.79). d) Additional visualisations and information (e.g. Lighting Strategy) is needed to show the Scheme (as set out in the first draft DCO) and its impacts (both positive and negative) on aspects of the historic environment. These must show the reasonable worst-case scenario within the Order Limits and should include static and kinetic, as well as day and night-time, visualisations. The visualisations should include all aspect of the development to fully reflect the impact this would have. This includes all associated infrastructure (fences, security camera columns, lighting, compounds etc). e) The conclusions drawn around the magnitude of impact (Settings Assessment (EN010147/APP/6.5) in relation to the highly designated heritage assets appear to have been downplayed in our view and we recommend the applicant reconsiders or provides further clarity over these conclusions. f) The results of the trial trenching around the scheduled monument at Sansom's Platt remain outstanding, so it is not possible to be sure of the true extent of the settlement.	Evaluation reports setting out the results of the programme of trial trenching, including the trenches in the land around the Sansom's Platt Scheduled Monument, are currently being prepared. It is anticipated that these reports will be submitted at Deadline 5.	
REP1-085	Historic England	Other Matters 1.17 We recommend in future visits to the Site, the ExA walks the Public Rights of Ways through the agricultural fields (part of the application site) to the south and southwest of Bladon. We recommend the ExA observes the visual connection and contribution these fields make as part of the setting of the WHS, Blenheim Palace, Blenheim RPG, and the churches of St Peter and St Paul, Church Hanborough, St Peter's, Cassington and St Michael's in Begbroke. In the northern section of the application site, we recommend the ExA visit the scheduled monument of Sansom's Platt to assess the impact upon it through the proposed change of setting. 1.18 We recommend consideration is given to including a provision within Schedule 16 of the DCO for the Local Planning Authority to consult with third parties. 1.19 We recommend further clarity is provided over Schedule 2 in relation to Archaeology (10) and the locations of those intrusive archaeological surveys are defined. We would be grateful if this could be clarified.	Schedule 16 sets out the procedure for the discharge of all of the requirements on the whole. It therefore isn't the appropriate place to oblige the local authorities to consult third parties. However, the Applicant recognises that in some instances it is appropriate for a specific Requirement to only be discharged in consultation with a named body. For example, Requirement 7 of the draft DCO confirms that the approval of the biodiversity net gain plan must be "*in consultation with the relevant statutory nature conservation body*". If Historic England wish to be a named consultee for the purposes of a specific requirement, then the Applicant would welcome that request. In any event, in absence of any express obligation on the face of the Order, it is at the LPA's discretion to consult with any body it considers appropriate and the DCO does not preclude that. Further information regarding the potential locations of intrusive archaeological surveys is set out in Revision 2 of the Outline Written Scheme of Investigation **[EN010147/APP/7.6.5]** submitted at Deadline 2.	Historic Environment
REP1-087	Natural England	Protected Species Bat Species Assemblage Evidence shows that the environment of the proposal includes a complex of interconnected habitats which are of notable importance for bats. Bat surveys undertaken to inform the Botley West Solar Farm NSIP DCO application have identified that an assemblage of bats of at least national importance is present within the zone of influence of the development. This includes the presence of two Annex II species, barbastelle and Bechstein's bat, including the first record for the county for breeding Bechstein's bat. Species listed under Annex II of the Habitats Directive, are 'species of community interest'. These species have been selected for inclusion in Annex II because their conservation requires additional specific protection measures, i.e. the designation of SACs, because they are particularly rare and/or vulnerable. Consideration of protected species and the avoidance of adverse impacts upon them is an essential part of the planning process. As set out in Government Circular ODPM 06/2005 (as referenced within NPPF and paragraph 5.4.3 of National Policy Statement (NPS) EN1), protected species are a material consideration in planning and it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. Section 5.4 of NPS EN1 states in paragraph 5.4.48 'In taking decisions, the Secretary of State should ensure that appropriate weight is attached to….protected species…' and in paragraph 5.4.55 that 'The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance….which they consider may result from a proposed development.' NPS EN1 also states in paragraph 5.4.39 '…The Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan 2023… and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.' One such target of the EIP 2023 is to 'Halt the decline in species abundance by 2030, and then increase abundance by at least 10% to exceed 2022 levels by 2042'. Ensuring that development does not adversely affect protected and other notable species will be an important factor in delivering this target.	As set out in the Statement of Common Ground between the Applicant and Natural England [**REP01-028**], discussions on this matter are on-going. Further survey work and data gathering was completed in 2024 alongside further survey work in spring 2025. Data will be provided to the Examination as a separate bat technical note 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.	Local Ecology and Nature

		This is especially true of rare and vulnerable species such as Annex II listed and species assemblages of national importance such as those present within the site. Published literature suggests that bats may avoid areas of solar panels (Tinsley et al 20231, Szabadi et al 20232), and that altering the landscape with the addition of man-made structures and urbanisation can affect habitat usage and behaviour of bats (Barré et al 20243, Hale et al. 20124, Jung and Threlfall 20165 Suominen et al 20236). Given the presence onsite of a bat assemblage of at least national importance including rare and vulnerable species, the close proximity of multiple maternity roosts to the site, alongside the scale of the development, potential for adverse impacts on the ability of bats to forage and traverse the landscape cannot be dismissed. Avoiding such impacts should be an essential aspect of the development design. We continue to advise that the avoidance of fragmentation of this area is required in order for the scheme to demonstrate that the functionality of this exceptional environment will be maintained for bats. One way to reduce the risk of such impacts is to provide adequate areas of non-developed or ecologically enhanced land containing linear habitats and buffers, to retain and provide key linkages through the landscape. These need to be provided on an appropriate scale, location, orientation and number to mitigate for potential avoidance and habitat fragmentation effects. These areas can, if designed and managed appropriately, also provide foraging opportunities in themselves, adding to the value as well as permeability of the altered landscape. We advise that these should be included in an appropriate Masterplan and secured via appropriate control documents (for example LEMP) and we welcome the continued discussion with the applicant's ecologists on this matter. We have provided detailed advice and recommendations for how the Applicant should address concerns regarding impacts to the bat assemblage in our relevant representations **[RR-0761]**. This advice is still relevant and should be read alongside our Written representations. We met with the Applicant on the 19th March 2025 and the 28th April 2025 and discussed our advice on impacts to the bat species assemblage. During these meetings the Applicant informed us that a significant amount of bat survey effort (winter 2024) had been conducted but was not included in the Environmental Statement **[APP-036 to APP-224]** due to time constraints. Natural England expect to update our position when the updated information is made available to us.		
REP1-087	Historic England	Conclusion 1.20 As outlined in our earlier Relevant Representations, Historic England recognises the importance of expanding the provision of renewable energy and considers the Scheme (as presently articulated in the draft DCO) would contribute to the sustainability of the World Heritage Site. 1.21 However, we advise that the identified harm to the most highly graded heritage assets, namely to the WHS, could be reduced in accordance with paragraph 5.9.24 of the Overarching National Policy Statement (NPS) for Energy (EN-1). 1.22 It is also essential that all relevant evidence is made available so we can advise the ExA of our views to enable an informed decision to be made on any impacts to the historic environment. 1.23 Our Written Representations highlight the information and refinements that we advise remain necessary at this stage to determine the Application for the first draft DCO. We will continue our dialogue regarding these matters with the Applicant, through our role as a statutory consultee. We hope that through our continued and constructive engagement, we will be able to resolve these outstanding matters during the course of the Examination. 1.24 Historic England will also ensure that any further correspondence from UNESCO to the UK State Party regarding the proposed scheme will also be submitted to the Planning Inspectorate to inform the Examination	The Applicant notes these comments from Historic England.	Historic Environment
REP1-087	Natural England	Soils and best and most versatile agricultural land Overview Based on the information provided within the Environmental Statement (ES) (Chapter 17: Agricultural Land Use and Public Rights of Way), it appears that the proposed development will result in the temporary development of 839ha. It is not clear exactly how much of this is BMV agricultural land (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system), as determined from detailed ALC surveys. Table 17.17 of Chapter 17 of the ES shows that 36.4% of the land surveyed is BMV, but the survey area is more extensive than the 839ha. During the life of the proposed development, it is likely that there will be a reduction in agricultural production over the whole development area. Furthermore, if not time limited as described, the proposed development has the potential to lead to the permanent reduction in agricultural production. This should be considered whether this is an effective use of land in line with the National Policy Statement for Energy (EN-1) and Renewable Energy Infrastructure (EN-3), which encourages the Applicant to seek to	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 nature of the development is also secured as temporary, pursuant to the requirement to Decommission at Requirement 14 of the draft DCO. The Applicant notes that Natural England consider that 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

		‘minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations’. We would also draw to your attention to Planning Practice Guidance for Renewable and Low Carbon Energy (March 2015) (in particular paragraph 013) and advise you to fully consider BMV land issues in accordance with that guidance. Loss of Best and Most Versatile Agricultural Land It is considered that as the solar panels would be secured to the ground by steel piles with limited soil disturbance, they could be removed in the future with no permanent loss of agricultural land quality, provided the appropriate soil management is employed and the development is undertaken to high standards. Consequently, Natural England advise that any grant of consent should be made subject to requirements to safeguard soil resources and agricultural land. We note that the draft DCO includes requirement 11 which incorporates the need for a soil management plan. It is assumed within the ES that the majority of the development will not lead to any permanent loss of agricultural land. The area proposed to be occupied by the substations, and totaling 5.5ha of BMV land will be permanently lost. [some kind of conclusion statement agreeing this is not significant?] We note that the outline Soil Resource Management Plan (Annex C of the Outline Code of Construction Practice (oCoCP)) does not include measures to return hardstanding to agriculture.		
REP1-087	Natural England	Cable Route ES Table 17.5 acknowledges that no soil survey has been undertaken along the cable route corridor. Paragraph 9.3.4 of the oCoCP highlights that the cable route corridor has not yet been surveyed. We would recommend that this survey need is written into the oSMP. Natural England recognise that a deviation from the standard soil survey methodology will be required due to the linear nature of the cable trench. Natural England advise that this further survey work should be made a requirement of the DCO, to ensure the appropriate soil management can be implemented along the cable corridor. Restoration of the cable trenches to their current ALC grade should also be secured to ensure the impacts along the cable route are only temporary as described.	The Applicant is arranging access to survey the additional cable route areas. However, there is a commitment as part of the outline SMP (APP-233) at paragraph 9.3.4 to include the results of the additional survey work of the cable route option areas within the detailed SMP that would be developed prior to construction.	Agricultural Land Use
REP1-087	Natural England	Outline Soil Management Plan Natural England welcomes the preparation of an Outline Soil Management Plan (oSMP) which has been prepared and submitted with the application. We note the outline nature of the plan and understand that the detailed SMP will include the full suite of information outlined in the oSMP. We have set out our advice on the oSMP below: • We welcome that the oSMP is based on the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. The British Society of Soil Science has published the Guidance Note ‘Benefitting from Soil Management in Development and Construction’ which sets out measures for the protection of soils within the planning system and the development of individual sites, which we also recommend is followed. • The oSMP does not make reference to soil sampling along the cable route. As discussed previously, soil sampling along the cable route should be made a requirement of the DCO, to ensure operations and restoration are correctly informed and the cable route is restored to it’s current ALC grade. Given that Requirement 11 links to the oSMP, an update to the oSMP would mean our guidance is incorporated. • The stockpiled soils should be labelled and protected from trafficking and damage. Any soil stockpiles in place for more than 6 months need to be seeded. • Areas of the site which are not to be stripped or used for stockpiling, haul routes or compounds must be clearly marked by signs and barrier tape and protected from trafficking and construction	The Applicant notes that Natural England welcomes the oSMP **[APP-233]**. The oSMP does make reference to the incorporation of the survey results for the additional cable option areas at paragraph 9.3.4. to be included in the detailed SMP to be developed pre-construction (Requirement 11) The oSMP **[APP-233]** does include for seeding of bunded areas at paragraph 9.5.5 where all storage bunds intended to remain in situ for more than 3 months or over the winter period would be seeded and managed to control weeds as necessary. The outline SMP **[APP-233]** identifies at 9.5.5 that the locations of storage mounds would be planned within the detailed SMP to ensure that potential for damage to the soil storage heaps and/or contamination of the heaps with foreign construction materials is limited, as far as possible.	Agricultural Land Use
REP1-088	Network Rail Infrastructure Limited	Network Rail does not object to the project in principle. However, Network Rail is under a statutory duty to protect the operational railway and associated railway infrastructure. Network Rail wishes to continue to seek an agreement on the protections and agreements in a form that is well precedented and acceptable to Network Rail before the close of the examination. In the event, that insufficient progress is made regarding the protective provisions and private agreements, Network Rail would like to reserve its position to request to be heard in an appropriate hearing to explain the impact of the proposals on its railway undertaking.	The Applicant appreciates Network Rail’s engagement to date on the protective provisions. The protective provisions have been agreed save for the inclusion of wording that would affect the Applicant’s use of compulsory acquisition powers. A framework agreement is being negotiated between the parties to resolve this. In the meantime, a draft form of protective provisions is included at Part 4 of Schedule 15 of the draft DCO for the protection of Network Rail. The Applicant is eager to continue negotiations on the framework agreement and most recently shared comments on 9 May 2025 and will await any comments.	Land Agreements

REP1-093	Begbroke and Yarnton Green Belt Campaign	The Rule 8 letter requested suggestions for Accompanied Site Inspection locations in the Examination Timetable at Item 10. We do have one suggestion, which is on Spring Hill adjacent to Begbroke, accessed along Spring Hill Road from the A44 and thence up a private driveway of 1km in length. The BYG chair, Giles Lewis, lives on Spring Hill, shares control of the driveway with the landowner, and will be happy to arrange access and to accompany members of the ExA who attend in order to ensure the key viewpoints in this area are visited. For those constructing the visit programme we envisage this will take about 40 minutes and a formal invitation will be forwarded by Giles and by BYG in time for Deadline 2 on 1st July this year.	The Applicant notes Begbroke and Yarnton Green Belt Campaign's suggestion for the location of an Accompanied Site Inspection at Spring Hill, adjacent to Begbroke.	Acknowledgement
REP1-094	Begbroke and Yarnton Green Belt Campaign	Please see REP1-090 above.	Please see response to REP1-090 above.	Acknowledgement
REP1-111	Southern Gas Networks plc	We refer to Deadline 1 today, which is the deadline for Interested Parties to submit their Written Representations. As set out in SGN's Relevant Representation, SGN has been engaging with the Promoter to agree protective provisions. Discussions have been ongoing and are hoped to conclude shortly. Taking this fact into account, and in the interests of efficiency, SGN is therefore providing this brief update to the Examination on the status of its discussions with the Promoter in lieu of a formal Written Representation. As soon as discussions between SGN and the Promoter have completed, which is expected shortly, we will be in contact again to provide a further update to the Examining Authority.	The Applicant acknowledges the response of Southern Gas Networks plc in regard to the on-going discussions and agrees that the discussions should be completed shortly and the ExA further updated.	Acknowledgement

2.2 Non-Statutory Consultees

Table 2.2: Applicant's Responses to Written Representations provided at Deadline 1 – Non-Statutory Consultees

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-091	Begbroke and Yarnton Green Belt Campaign	Given the sensitivity of the site selected, which is largely Green Belt with a high degree of BMV land and in close proximity to a WHS, it is important to establish whether the availability of land from Blenheim estate was a primary consideration in site selection, and overrode other considerations described by the applicants. We, therefore, ask the ExA to follow this up with the Applicant to establish whether a serious review of realistic alternative sites ever took place.	The NPS policy on site selection, is not overtly prescriptive, there is no absolute criterion that has to be followed when site finding. Fundamentally, the Applicant has been led by: - Factors that are noted as influencing site selection are set out in NPS EN-3, para 2.10.18 - Plus guidance relating to the assessment and minimising adverse effects – the applicants assessment section of EN-3 The Applicant has followed this policy. The selection and assessment chronology 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 including land availability and suitability.	Site Selection and Cable Route Alternatives
REP1-092	Begbroke and Yarnton Green Belt Campaign	It is suggested that the ExA requires the applicant to provide detailed photomontages of the views to the West that tourists travelling on buses and coaches will have as they approach Woodstock on their journey to the town and WHS.	The potential impacts of the Project upon all sensitive Landscape and Visual receptors, within the 5 km Study Area, including views from Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment **[APP-045]**. Thirty-three photomontages **[APP-072 to 080]** were completed as part of the LVIA. The locations of these were agreed with statutory consultees and are considered appropriate and the number proportionate to the Project. They and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance **[APP_149]**. This has ensured that the Project was visualised and assessed at different times of the year, including when the screening effects of vegetation are lower. Consultation with the host authorities was carried out to determine the suitability of the selected Representative Viewpoints. Where alternative / additional Representative Viewpoints were suggested or asked for, these were visited and either included as part of the final selected Representative Viewpoints or discounted. Refer to individual host authorities within table 8.5 of the LVIA **[APP-045]**. This included referral and consideration of Important Views as detailed in the Cumnor Parish Neighbourhood Plan. A number of Representative Viewpoints are selected as representative of these important views where possible om publicly accessible locations. Not all 'important' views were considered relevant due to the direction of those views.	Landscape and Visual Impacts
REP1-095	Begbroke and Yarnton Green Belt Campaign	**[APP-022]** Appendix 1 suggests the source of funding for the project appears to be the Limmasol based company, Cransseta Investments Limited, wholly owned by the Russian national Julia Lezhen and for which no financial information has been provided. Can audited accounts for this company be provided to confirm that the necessary funds are available for both the compulsory purchase costs and subsequent stages of the project? Can there also be detailed confirmation of the source or quantum of any funds that will be provided by Cransseta to the Botley West project?	Accounts for Cransseta Investments Ltd. are publicly available. Further financing will be made available to the Applicant from shareholders, Cransseta and/or other UK based funders as they appear due. Subsequent stages of the project will be funded by those sources as well. Construction financing will be procured on a non-recourse financing basis from banks and specialised infrastructure funds. Cransseta accumulated funds from previous business activities in solar development in Japan. The amount of financing provided to the applicant from different sources are reflected in the annual financial statements, that are publicly available. Yulia Lezhen is a Cypriot resident and holds a Cypriot passport.	Funding and PPA
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	BVHRC is concerned about the loss of amenity that such a large solar farm will have on Bladon Parish. Bladon directly borders the Blenheim Estate, which means that the recreation ground is the only publicly available open space available to residents. Erecting a solar farm of this size so close to the only recreational area in the village will undoubtedly have a negative impact on human health. (Map reference 6-01, 6-02, and 6-03 in the PINS document library). If the proposal is approved, we would like to see these fields removed.	The fields referred to are currently used for intensive agriculture and subject to large chemical inputs. Over the course of the Project this intensive agricultural activity will cease in this area. ES chapter 9, Human Health **[APP-053]** sets out the impact of the solar panels on PRoWs and on views from outside the project boundary. 16.9.121 judges the significance of the health effect to be minor adverse (not significant). Fields 6-01, 6-02, 6-03 are the subject of a change request to the Examining Authority.	Community Benefits and Impacts
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	BVHRC believes that the development will have a significant impact on the surrounding communities and, should the development be granted permission, the current suggested community benefits are far from adequate to compensate for such impacts and should be significantly increased. Originally the community fund of £50,000 per annum (£59 per MW based on 840MW's) was suggested, this has since been increased to £200,000. Neither of these figures is comparable to the community funds that other renewable energy projects have provided. For example, Tower Hill Solar Farm agreed with Tytherington Parish Council a community fund of £875 index linked per MW per annum for their considerably smaller 6.46MW development. For reference £875 uplifted to Dec 23 price base is approximately £1,189. Research has shown that the average £'000 per MW for solar developments is £3,000 and it should be noted that £3,000 is an average and there are developments that have agreed £5,000 per MW per annum. Also, due to the extreme size of this development, it will affect significantly more communities than just one or two villages affected by the Tower Hill Solar Farm, and to expect	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, £441,000 annual contribution. Low Carbon Hub and Cherwell Collective have asked that the fund support community energy initiatives and measures to reduce energy use – grants for loft insulation, towards heat pumps and rooftop solar panels. Yarnton Football Club have asked for help upgrading their changing rooms. Grants could be given to community growers to help with set-up costs. Cutteslowe Larder have asked for support for their food parcel scheme and for rooftop solar panels on their community hall. The Parish Council Working Group has proposed setting up a Community Interest Company to administer the fund, to ensure the money goes to the communities in the villages neighbouring the project. Blenheim Estate have a fund of their own and would like to be involved in helping direct the funds focus.	Community Benefits and Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		£200,000 to be shared between approximately 10 other parishes makes the usefulness of the fund redundant. From the information available, it is not clear how any benefits provided by the creation of solar power under this proposal can outweigh the detrimental impact on the Green Belt and biodiversity, the permanent physical and visible changes to the landscape, the loss of amenities for the public and the loss of BMV agricultural land from arable production. Further points and more detailed comments are provided in the attached in Annex A, and although the greatest impact felt by Bladon Parish residents will be from the middle section of the proposal, some of the comments below may also be relevant to the whole of the proposal.		
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	The predominant land use around Bladon village is for arable farming and a significant amount of this land is classed as Best and Most Versatile Agricultural Land. The use of such land goes against the NPPF principles of protecting high quality agricultural land from development. BVHRC is also concerned with the loss of arable production at a time when food security is an issue.	The effect of the Project on best and most versatile land and farm holdings is assessed in Section 17.9 of ES Chapter 17: Agricultural Land Use and Public Rights of Way (APP-054). Whilst there would be a change in agricultural production within the Site, the reduction would not jeopardise the continued operation of the farm holdings that lie within the Site. Section 17.6.28 of the Chapter identifies that the Government Dataset for Agricultural Land Use in the United Kingdom provides historic data on trends in agricultural land use since 2010. This data shows that the total area of agricultural land has remained stable across this period with the utilised agricultural area varying between 70 and 72% of the total area of the UK. The Oxfordshire Food Strategy (2022) identified that approximately 74% of Oxfordshire land area is agricultural being mainly cereals. The total croppable area has also remained consistently around 6 million hectares. Despite variations in yields from year to year, often affected by weather or particular market conditions, and the implementation of changes in land use related to individual developments, the cropped area of land has remained stable within the UK.	Agricultural Land Use
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	The enclosing of the PRoWs will also prevent the free roaming of the wildlife in the area and may cause conflict between users, including those with dogs, and the larger wild animals in the area.	The detailed design of the landscaping of the PRoW will be developed in accordance with the outline Landscape and Ecological Management Plan **[APP-235]** and the outline Landscape, Ecology and Amenities Plan **[APP-228]** where access for wildlife is maintained throughout the Project site.	Public Right of Way
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	The current buffer zones are insufficient, and the proposed removal of walking paths needs to be looked at again. Part of the permanent changes to the landscape includes the enclosing of hundreds of kilometres of Public Rights of Way (PRoW) with 2.1m high fencing. For the residents of Bladon, the proposal will enclose all of the rights of way in the south of Bladon, which is approximately 5.8km of PRoW (refer to Annex C Map). It should be noted that these are the only public PRoWs available to Bladon residents as the village borders Blenheim Place land to the North and although there are permissive paths, which can be revoked at any time, there are no PRoWs. This enclosing will affect the amenity of the PRoWs by creating unattractive corridors that will deter not only local users but also those who would have visited the area to enjoy the countryside.	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.	Landscape and Visual Impacts
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	Bladon village is surrounded by rolling farmland and much of the landscape is open and visually sensitive. The views southwards out of the village and towards the development have been identified as being important in The Bladon Conservation Area - Conservation Area Character Appraisal. With the information provided, it is clear that the area around Bladon will be physically and visibly changed.	Noted.	Landscape and Visual Impacts
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	Even if a significantly increased buffer zone can be achieved and some walking paths retained, BVHRC is concerned about the negative effect on the Green Belt. Based on the information provided, it is evident that there will be a detrimental impact on the landscape character of the area and the local biodiversity.	The Applicant notes the BVHRC concerns about the effect of development within the Green Belt, but the Applicant is of the view that, on balance, the harm has been offset by the VSC applicable to this development (please refer to the detail in the Applicants' Planning Supporting Statement, Appendix 8 **[REP1-012]**. Some further adjustments to the Applicant's layout will further minimise harm (to be the subject of a second Change Request application to be made shortly by the Applicant). The Applicant is retaining all PRoW and adding new ones to the area **[APP-054 & APP-112]**. Biodiversity will increase, not reduce **[APP-162]** and biodiversity net gain has been prioritised within the project parameters. A target of 70% habitat BNG has been set by the Applicant. Landscape character impacts are reported in **[APP-045]**. The existing landscape character has been retained as far as practicable by the Project. No significant effects have been identified on the Landscape Character within the 5km study area.	Green Belt
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	BVHRC feels that the loss of all Green Belt around Bladon is unacceptable, and that the Planning Inspectorate should consider this proposal alongside all the other developments proposed in the area. These other developments will be removing large areas of open countryside just outside the boundaries of the designated	The Applicant notes the BVHRC concerns about the effect of development within the Green Belt, but the Applicant is of the view that, on balance, the harm has been offset by the VSC applicable to this	Green Belt

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		Green Belt and if the BWSF development is approved, it will result in near-continuous development between Oxford and Woodstock. (refer to Annex B Map)	development (please refer to the detail in the Applicants' Planning Supporting Statement, Appendix 8 **[REP1-012]**. Some further adjustments to the Applicants layout, including land south of Bladon, will further minimise harm (to be the subject of a second Change Request application to be made shortly by the Applicant). The Applicant is aware of and where relevant has cumulatively assessed the development shown in IP's Appendix B map. **[see APP116-118 and APP-224]**.	
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	Maintenance of the land beneath the panels and long-term retention of soil quality would be an important issue. This issue should be addressed at an early stage.	The implementation of best practice measures in the outline Soil Management Plan (APP-233) (secured through Requirement 11) and the outline Landscape and Ecological Management Plan (APP-235) (secured through Requirement 6) would ensure that these concerns are addressed at an early stage.	Agricultural Land Use
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	Quality of farmland might be an issue. "In assessing land use and agriculture, we have been conducting a number of Agricultural Land Classification surveys - 62% 3b; 38% 3a +." (November 2023 Leaflet p19) but apparently not externally verified.	The ALC survey methodology and the results have been discussed with and the technical data provided to Natural England for their consideration, as explained in Volume 1, Chapter 17, Agricultural Land Use and Public Rights of Way (APP-054).	Agricultural Land Use
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	The value of nearby houses would undoubtedly be reduced if this solar farm proceeds; compensation for this should be paid.	The Socio Economics ES Chapter **[APP-052]** references a UK study ('Is NIMBYism Standing in the Way of the Clean Energy Transition?' Jarvis, 2021) which found no clear evidence of an effect on residential property values from solar Projects in the UK. The value of individual properties is not, in any case, a material planning consideration.	Socio economics
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	The developer is PVDP – Photovolt Development Partners – "Our team comprises highly qualified engineers and technicians with experience of designing and constructing solar parks worldwide ..." However, there seems to be an absence of a named independent landscape consultant, to ensure that the interests of local people and this attractive landscape receive proper consideration.	In the preparation of the Environmental Statement, Applicant has appointed competent experts with relevant subject expertise per Regulation 14(4)(a) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. In response to the comment on an independent landscape consultant, the Applicant is obtaining consultancy advice in line with best practice / standards / methods from specialist consultants. This advice will be considered and applied further under the EPC that will be constructing and maintaining the Proposed Development.	Construction period and methods
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	In solar farms already built in this region heavy vehicles used during installation have tended to result in footpaths and adjacent ground (and presumably also land beneath the solar panels) being compressed and chewed up; this should be avoided by proper landscape specification and supervision.	The oCoCP / outline soil and outline PROW Management Plans **[APP-232 + APP-233]** will be used as tools to inform the detailed management plans include measures such as a supervisory ecological and arboricultural Clerk of Works and commitments to avoid soil compaction.	Construction period and methods
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	No analysis appears to have been carried out to identify conflicts with obvious locations for future new housing associated with villages, necessary to achieve government policy related to desirable volume of new house building.	A cumulative impact assessment has been undertaken with relevant development, including residential development. The methodology used and the developments considered can be found at **[APP – 057]**.	Community Benefits and Impacts
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	"At the end of Botley West's operational life ..... the land will return to its original use, and not become brownfield land ..." (November 2023 Leaflet, p.19). This is good policy which needs legally binding documentation. However, to make a significant contribution to countering global warming, any benefits of this electricity generation may not come to an end in the foreseeable future.	Details of the Applicant's response on decommissioning, restoration of the land and the methods for securing these measures are details in the Applicant's Response to Relevant Representations [**REP1-020]** at Section 11.	Acknowledgement
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	Page 17 of the November 2023 Leaflet states "a minimum 5m buffer zone for hedgerows, trees, ponds and woodland ..."; this is far too little to protect the roots of existing trees. British Standard 5837:2012 has recommendations about this which should be followed.	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.	Trees Plants and Flora
REP1-103	ICOMOS-UK (Cultural Landscapes	Dense tall wide hedgerow planting should be a standard treatment along all the edges of the solar panel arrays.	The Project will deliver over 26km of new species-rich hedgerow, reinforce at least a further 26km of existing hedgerow. It will also retain and enhance the remaining existing hedgerow resource across the Project site through improved management, as set out in the oLEMP.	Trees Plants and Flora

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
	and Historic Gardens Committee)			
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	Inadequate space is provided around public footpaths. The land beside the existing wooded east/west footpath across the northern solar farm proposal (SW of Masterplan-North Section 1) is sufficient to substantially seclude the path from adjacent land and to include mature trees; it is 25m wide. Beside the Withy Clump footpath south of Bladon, it is 7-10 m from the outside of the adjacent thick hedge to the edge of the wood beside the path. These dimensions suggest that footpaths with solar panels on both sides should, as a standard requirement, run in an unobstructed width of 20-25m between the access tracks outside the fences around solar arrays. Where a path has solar arrays beside one side at least 12m should be left as a buffer beyond the access track alongside solar array fencing.	Please refer to 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
REP1-103	ICOMOS-UK (Cultural Landscapes and Historic Gardens Committee)	Solar arrays should be kept apart from all villages by a significant landscape breathing space and never be closer than a 3 minute leisurely walk (200m) from houses on the edges of villages - Shipton Slade, Bladon, Begbroke, Cassington, Church Hanborough. A planning condition is needed stating the landscape treatment and its long-term management round the edge of each solar farm area and beside affected public footpaths. The spatial framework of the new Salt Cross Village should be respected by excluding from consideration for solar farm development all the fields north-east of the village across which "panoramic views" are proposed. The Applicant's proposals appear to have ignored topography. The conspicuous steep slopes near Hordley and Sansoms Farms (North Area), beside the B4027 and numerous public footpaths including the Oxfordshire Way (Akeman Street), should not be covered with solar panels. There should be no solar panels on any of the escarpment on the east side of the Evenlode Valley. No solar arrays should be placed on the sloping sides of the ridge to the south of Church Hanborough village, crowned by a soaring limestone steeple ... seen across fields. The South Site, largely a highly visible north facing slope, is a totally unsuitable place for a solar farm and should be omitted from the proposal, except for the necessary substation, carefully sited. To clarify the location of these proposed omissions from the solar farm they are marked up on the 7 sheets of the Preliminary Masterplan, and could, if helpful, be shown on a subsequent set of clear location plans yet to be supplied	The Applicant's detailed assessment of the likely impacts and effects of the Project on the Church Hanborough Conservation Area is presented in paragraphs 1.9.115 – 1.9.118 of ES Appendix 7.5: Settings Assessment **[APP-142]**. The assessment concluded that the heritage significance of the Church Hanborough Conservation Area would be slightly harmed as a result of the change within its setting. This represents an impact of 'low adverse' magnitude resulting in a long-term (time-limited), reversible 'minor adverse' effect. This is not significant in EIA terms. The detailed assessment of the likely impacts and effects of the Project on the heritage significance of the Grade I listed Church of St Peter and St Paul at Church Hanborough is presented within paragraphs 1.9.27 – 1.9.31 of ES Appendix 7.5: Settings Assessment **[APP-142]**. The assessment included a review of visualisations from Viewpoints 27 and 38 which show existing winter and summer views along with illustrative winter year 1 and summer year 15 visualisations. The visualisations from Viewpoint 27 are presented as Figures 8.312 – 8.315 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 5 of 9 **[APP-076]**. The visualisations from Viewpoint 38 are presented as Figures 8.336 – 8.339 in ES Figures 8.248-8.371: Photomontages (Winter and Summer) Part 7 of 9 **[APP-078]**. Project Impacts will be mitigated against by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[APP_062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. The existing public rights of way network would be retained and managed during the construction of the project in accordance with the outline Public Rights of Way Management plan **[APP-232]**. They would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. As such, the public's access would not be restricted. For more information on effect on the public rights of way network see ES Chapter 17: Agricultural Land Use and Public Rights of Way **[APP-054]**. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerow would be managed to an appropriate height (3m to 4m) which over time would help to screen some available views to the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured, however, due to the undulating nature of the topography in the local area it would not be possible to entirely screen the Project. However, there would be no location point along the public rights of way network where a visual appreciation of the whole Project would be possible. Rather, there would be intermittent, transitory views to parts of it. The effect is therefore lessened. With all existing Public Rights of Way (PRoW) retained on their existing routes with hedgerows to the edge to minimise the visual effect of the Project. Views to local landmarks, including the Church of St Peter & St Paul, Church Hanborough would be maintained, as illustrated in the photomontage for Representative Viewpoint 38 **[APP-072]**.	Landscape and Visual Impacts
REP1-104	John Wynne - The Glyme Valley Project	We would like to add this Specific Issues to the current WODC LIR list of nine: Cumulative Impact on Statutory Frameworks - our proposal Cumulative Impact in Disparate Frameworks: Third, we raise the matter about the disparity between the Specific Issue of Cumulative Impact within a) the Planning Inspectorate Framework versus b) Local Government statutory Frameworks. This Specific Issue needs addressing, again due to the unprecedented scale of this project, coupled to its adjacency to densely populated urban areas espaliered up against Europe's biggest proposed industrial RE facility. As with DESNZ, social metrics and social capital are increasingly being integrated into statutory decision making processes that bind Central Government, Local Government (OCC, WODC, Cherwell, VOWH, Parish Councils). Social and	Please clarify what you are referring to when you say "Disparate Frameworks". The matters that you have outlined, relating to social and well-being impacts, have all been comprehensively assessed as part of the Human Health **[APP-53]** and Socio-Economics **[APP-52]** Chapters of the ES. These chapters, and the Planning Supporting Statement **[APP-225]** have assessed such impacts against relevant National and Local Policy. Cumulative Effects from the proposed development are considered in individual ES topic chapters and brought together in ES Chapter 20 'Cumulative Effects and Inter-relationships' **[APP-057]**. The approach to cumulative effects assessment considers effects on environmental receptors from two or more developments which could occur at the same time, and which could result in greater effects than if the Project occurred on its own.	Cumulative Impacts

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		well-being metrics have fast emerged as the other side of the coin to the environmental ecological narrative and are inextricably bound up to the transition to 2050 Net Zero. With this trajectory in mind, OCC have already committed to adopting an exemplary framework called OXLAEP (Local Area Energy Plan) with Ove Arups, a world-renowned lead engineering and sustainability consultant. Further, in addition to SDGs and Circular Economy tools, OCC have also recently adopted a framework for governmental decision-making that is dependent on social metrics, called Doughnut Economics. DE has already been adopted formally by the European municipalities of Amsterdam, Brussels, Copenhagen, Glasgow. This promotes Oxford and Oxfordshire squarely into the same league as this forward-looking Northern European municipal group. The significant risk here is that the Planning Inspectorate will be looking through an entirely different lens for reviewing BWSF that is not fit for purpose for today's local government legislation. Add onto this stack, the incoming OXLAEP 2026 and Devolution 2028 agendas, and the rifting between the lenses of the Planning Inspectorate and OCC/WODC will become even more pronounced and incoherent. Omitting this 'Cumulative Impact' Specific Issue on any NSIP (above 50MW), let alone a project of the BW scale, 840MW,will lead to significant distortion and risk and health disparity and inequity. Which is why initiatives such as DESNZ's Mandatory Shared Ownership Model and the REM are both important. But they will not be able to be meaningfully and coherently generated at scale without a robust Cumulative Impact focus built into the Planning Inspectorate framework. Note that the matter of scaled social capital is central to this – the current NSIP framework is not fit for purpose for this.	The cumulative and inter-relationships assessments have been carried out in accordance with PINS Guidance for NSIP projects relating to Cumulative Effects Assessment and set out in PINS Scoping Opinion **[APP-126]**. The approach to assessment and reporting in the ES adheres to National Policy Statement EN-1. The list of schemes shortlisted for the assessment of cumulative effects by the Project are set out in the ES Chapter with further detail provided in Appendix 20.1 Cumulative Developments Longlist and Shortlist **[APP-224]**. The list of shortlisted schemes resulted from consultation and engagement with WODC over the methodology on the Cumulative Assessment. The approach taken in the ES to Cumulative Effects Assessment is entirely consistent with PINS guidance and Scoping Opinion **[APP-126]**. With regard to health disparity and inequality, the ES includes detailed assessment of Health Impacts resulting from the construction and operation of the Project. This is set out in ES Chapter 16 Human Health **[APP-53]**. With regard to OXLEAP and Devolution 2028 Agendas, these are future initiatives that have yet to result in any formal structure or feed through to policy where they could reasonably be expected for considered by the Cumulative Effects Assessment. Considerable effort has been made to include an appropriate level of assessment for social factors. This is provided in ES Chapter 15 **[APP-052]** and considers the effects on socio-economics of the scheme. This Chapter aligns closely with the ES Chapter 16 Human Health **[APP-053]**.	
REP1-104	John Wynne - The Glyme Valley Project	We would like to add this Specific Issues to the current WODC LIR list of nine: Cumulative Impact on Heritage - our proposal Cumulative Impact on Heritage: We note from PVDP heritage experts in the Specific Issues Meeting May 16 2025, that risk to heritage assets is only required to be defined on an asset-by-asset basis. But at the scale at which BW is proposed – 3000 acres - the aggregate of the assets becomes important. Aggregation of numerous single asset assessments cannot possibly be valid at this scale. At no point has this scaling issue been addressed in the cumulative impacts on heritage methodology due to the unprecedented scale of assessing this heritage landscape for the BW application. The current methodology is not for purpose for such NSIPs.. We are currently consulting with UNESCO and ICOMOS.	This issue was raised in ISH1. In the answer to a question from the ExA, Historic England explained that it is not necessary to aggregate individually assessed impacts on multiple heritage assets into a larger single impact. No methodology exists for this approach to assessment.	World Heritage
REP1-104	John Wynne - The Glyme Valley Project	We would like to add this Specific Issues to the current WODC LIR list of nine: Cumulative Impact on Noise - our proposal Cumulative Impact on Noise and Vibration: It has also been confirmed by PVDP experts that noise and vibration is also only monitored on a point-bypoint basis. As with heritage, our concern with such a vast NSIP project, is that the sonic environment has to be assessed in its entirety, not point-by-point, which at best will indicate little, at worst will produce misleading results and distort the environmental, ecological and social outcomes. For instance, we have raised the concern that aviation safety is critical given the proximity of the proposed BW development to Oxford airport. But there is no requirement to review the cumulative impact of the noise from BWSF operationally, as an additional not-insignificant homogenous sonic layer sitting on top of the airport's own single point noise ratings. This is a significant safety hazard given that this airport is a major training facility, used daily by many inexperienced trainee pilots, many of whom are barely out of sixth form, learning to fly over urban residential areas and much-used roadways. There are also many recreational flying lessons that take off from Enstone airport only 6 miles north of the proposed BW site whose flightpath is frequently over the BW proposed site. The cumulative impact at scale of these sonic layers have not been addressed in any meaningful way. The current methodology is not for purpose for such NSIPs.	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. This assessment relies upon baseline noise measurements which have been undertaken following best measurements techniques (e.g. point measurements) in locations which are considered to best represent the noise sensitive receptors which have been considered. 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
REP1-104	John Wynne - The Glyme Valley Project	We would like to add this Specific Issues to the current WODC LIR list of nine : Strategic Alternatives : Glyme Valley REM - our Alternative proposal Strategic Alternative: Glyme Valley REM (Regional Energy Market): The Botley West Solar Park proposal is a mono-cultural behemoth predicated on a private equity financial model that is neither resilient nor equitable nor responsive to cross-governmental imperatives of a just transition and to incoming devolutionary	The Applicant notes the IP's comments and concerns. It believes it has followed the correct approach to reporting on alternatives. Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered **[APP-042]**. The Applicant notes with interest the IP's promotion of the Glyme Valley Regional Energy Market project. The planning status of this project was not captured on the list if cumulative developments **[APP-116 to 118 and APP-224]** for consideration by the Applicant or the host authorities, as it is	Site Selection and Cable Route Alternatives

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		regional empowerment in Oxfordshire (2028). Recent discussion about 'Alternatives' re BWSF Specific Issues seems focussed only on locations for alternative sites for BW substations (SI meeting 150525) rather than genuine alternative models for renewable infrastructures. The Glyme Valley REM is a place-based RE model, an Alternative to BWSF. It was conceived in 2023, well prior to the announcement of BWSF, as a resilient solution, not just an isolated 'energy' solution. The project brief with DESNZ is to produce a model for regional-scale, place-based, distributed, community owned, equitable solar renewable energy infrastructure in the Glyme Valley Oxfordshire. The first pilot 7mw site (one of six across the REM region) is proposed to be at Goose-Eye Farm, just south of Woodstock. DESNZ is currently scoping <5MW Mandatory Shared Ownership Models. The Glyme Valley REM is one such renewable model with DESNZ that foregrounds social innovation in scaling regional community infrastructures. To support this, we have built up a team of highly reputable mature companies with significant expertise in renewables projects. With Arup (we first engaged Ove Arup in the REM in 2024, prior to their OXLAEP selection), we are currently expanding our team to a specialist regional focus group within OCC's OXLAEP programme (2026 OXLAEP completion date). We are aligned with other UK regions in which regional community work at-scale is already maturing and where strong relationships with aligned infrastructure banks are already present. Oxfordshire has a lot to catch up on in this area, we are providing one such conduit. The Glyme Valley REM also provides an opportunity to test and prove renewables as a pillar to infrastructure resilience, anticipating the Oxon devolution deadline in 2028. In the case of BWSF, to apply this lack of cross-issue methodological Cumulative Impact re BWSF would sit a mono-cultural plastic and aluminium black box in the middle of a productive rural landscape. The outcome would be to create a generational impediment to a) resilience b) alternatives, c) heritage, d) aviation safety. There are more. It would block and prevent the incoming plethora of place-based regional resilience initiatives as required by current councils, future devolved Combined Authorities, DESNZ, DEFRA, Natural England, UNESCO, OCC, WODC, VOWH etc for at least the life-time of this proposed project, i.e. 40 years = 2065, which is 15 years after reaching the net zero deadline. Given the current financial conditions of Local Governments, such opportunity absolutely cannot be ignored.	understood to be at concept or model stage with no formal recognition/status in planning terms. No planning submission has been made, nor is there any allocation, the criteria normally applied for the consideration of alternatives in the type of decision-making process. Similarly, policy documents or administrative structures that are emerging have little or no weight in this type of decision making process as they are subject to change and have not yet been adopted.	
REP1-106	National Grid Electricity Transmission Plc	As there is a direct interaction between the Project and the Proposed NGET Farmoor Substation, it is essential that the Project and any subsequent Development Consent Order recognise this interaction, and that the protective provisions ensure that future working can be agreed between the parties. It is vital to ensure that there are no restrictions which would prevent the development of the NGET Farmoor substation at the NGET preferred site or at the site proposed within the Project, if this option is ultimately required. 15. Further, NGET's view is that wording should be included within the DCO to make clear that the Applicant's substation will only be brought forward if NGET is unable to obtain the necessary consents and land rights to enable the NGET Farmoor Substation to be brought forward. 16. NGET must ensure adequate projection for its future projects both in terms of protection for the ability to deliver and operate/maintain future assets, as well as ensuring that future land and rights for the delivery of these projects are not jeopardised.	The Applicant is working with NGET on protective provisions for the NGET assets at Farmoor. It is also working with the landowner and NGET to ensure access to the substation. Wording will be included in the DCO to confirm that the Applicant's substation will only be brought forward should NGET be unable to obtain the necessary consents and land rights for its own Farmoor substation to be brought forward. These matters will be covered in the Statement of Common Ground.	Grid Connection
REP1-108	Oxford Aviation Services Limited	The Airport's summary and next steps 2.13 The Airport agreed that it would withdraw its objection and sign a SOCG on the basis of the submission of an accepted Change Order to the DCO based on the	*2.13 The Airport agreed that it would withdraw its objection and sign a SOCG on the basis of the submission of an accepted Change Order to the DCO based on the revised layout, removing panels from areas of concern in respect of the EFATO zone.*	Aviation

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		revised layout, removing panels from areas of concern in respect of the EFATO zone, and on: • receipt of updated modelling to reflect improvements to issues of glint and glare; • amendments and proposals to mitigate impacts of increased and displaced animal activity; and • the production of modelling demonstrating no likely adverse effects of heat induced turbulence. 2.14 The Airport notes that Deadline D1 is the initial deadline for a SOCG. Given that constructive engagement has only recently taken place, it has not been possible to have a SOCG in place by the deadline. However, the Airport is committed to doing so if PVDP responds positively to recent discussions and actions identified at the meeting 21st May. 2.15 This Statement is the Airport's record of the meeting of 21 May and has not been shared with PVDP ahead of its submission to the Inspectors.	The Applicant is in discussion with the airport on the matter through the SoCG. and on: • *receipt of updated modelling to reflect improvements to issues of glint and glare;* The Applicant has is in discussion with the airport on the matter through the SoCG. • *amendments and proposals to mitigate impacts of increased and displaced animal activity;* The Applicant is in discussion with the airport on the matter through the SoCG. • *and the production of modelling demonstrating no likely adverse effects of heat induced turbulence.* The Applicant is in discussion with the airport on the matter through the SoCG. *2.14 The Airport notes that Deadline D1 is the initial deadline for a SOCG. Given that constructive engagement has only recently taken place, it has not been possible to have a SOCG in place by the deadline. However, the Airport is committed to doing so if PVDP responds positively to recent discussions and actions identified at the meeting 21st May.* The applicant submitted a draft SoCG for the Airport to consider. Further discussions have been planned for the 24th June. *2.15 This Statement is the Airport's record of the meeting of 21 May and has not been shared with PVDP ahead of its submission to the Inspectors.* Noted.	
REP1-109	Oxford School of Drama	The Oxford School of Drama relies upon its greenfield site as one of its key Unique Selling Propositions. This will be destroyed if it is surrounded by fields of solar panels, as per the proposal. As I am unable to link to the school's website as it is an external site, I have taken some stills from itspromotional video to indicate the importance of its green, rural location to its marketing and identity which I attach here.	Extensive areas of the Project have been removed for the purposes of protecting areas of archaeological interest. This includes large areas immediately adjacent to the Oxford School of Drama, as shown on the Illustrative Masterplan **[APP-062]**.	Landscape and Visual Impacts
REP1-110	Siemens Healthcare Limited	It is proposed as part of the Project to use land owned by Siemens to install cabling. The Order Limits identifies the requirement for an easement along Wharf Road which will run east from the junction with the B4044 along the length of the road and across the facility's rear car park at the eastern end of Wharf Road, all of which are within Siemens' ownership (Title No. ON129217). Part of Wharf Road is adopted by Oxfordshire County Council and the remainder is a private road. Siemens needs uninterrupted access over the entire road. 10. PVDP and their advisors have since confirmed that the cabling route that passes along Wharf Road through Siemens' security gates and into the rear car park is to be removed, leaving the preferred route on Siemens' Land which is along Wharf Road, entering adjoining land shortly before the security gates. Whilst this change is welcomed by Siemens, it does not resolve the central issue: interference with Siemens' continuous access to its facility via Wharf Road. Siemens' major concern over disruption to operations remains, with the consequent risk to the supply of MRI scanners. 11. The Order Limits identifies two, alternative cabling route options: a. Siemens' Land; or b. Cassington Road. Cable Route Option Studies 12. The proposals do not provide adequate criteria for the choice between the two options, including the weight that will be given to the risk of disruption to Siemens' facility and the resultant cost. Siemens' advisors, JLL, requested this information on a call on 5th September 2024 between JLL, Ardent and PVDP. On the call it was agreed that PVDP would provide an analysis of the pros and cons of each option. 13. At the point of submitting these representations, Siemens and their advisors, JLL, are yet to receive analysis of both options. JLL have continually requested for this information to be provided via email on: 23rd September 2024, 18th November, 25th November, 11th December and 19th December 2024, and 6th January 2025.	The Applicant acknowledges Siemens' concerns but emphasises that significant efforts have been made to address potential disruptions. This includes adjusting the proposed route to avoid critical areas within Siemens' premises, as evidenced by ongoing discussions and adjustments detailed in correspondence and meetings held. The Applicant has engaged with the Affected Party since October 2022, with further engagement and correspondence ongoing up to Examination. Virtual meetings were held on 25/07/2024 and 05/09/2024 to outline proposed mitigation measures to avoid road closures and reduce the Option Area across the gated section of Wharf Road (as confirmed via email dated 29/10/2024), ensuring uninterrupted access to Siemens' facility. This has coincided with the inclusion of the 3rd Party land (Plot 11-27 and 11-28) to the North of the Siemens plot to allow the cable to route north and reduce the impact on Siemens. Mitigation measures proposed included traffic management plans, works confined to one side of the carriageway to maintain flow, and programming the works during factory downtimes or quieter hours. Technical drawings, methodologies, and indicative timetables were provided. It was also proposed that works could be accommodated during factory downtimes, or shutdown period such as weekends or festive periods if this would help. Follow-up emails were sent to the Affected Party's agent between October and December 2024, and further requests for comment were made on 15/01/2025, 07/04/2025, and 07/05/2025. To date, no comments on the proposed mitigation or draft easement terms have been received from the Affected Party or their agent. Since the initial meetings to discuss routing of the cable in early 2024, the Applicant has identified a variation to the cable route to avoid tracking through the Affected Parties gated area part of Plot 11-29 and instead pass through land to the North. This allows the Applicant to route the cable north of the Affected Parties land, meaning only c2m of their Freehold title will be directly affected. The Applicant has therefore submitted a Change Request 2 notification alongside the Deadline 2 submission with the intention to alter the Order Limits, in particular to remove the road and car park beyond Siemens security gate, relying instead on the route to the north of this area as noted above. Details of the precise change to the Order Limits will be set out in its formal Change Application. An on-site meeting	Cable_Routes

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		6 March, 7 April and 7 May 2025. Considerable further engagement will be necessary in this regard so that it can be evidenced that all options have been exhausted prior to further engagement. 16. Given that Siemens highlighted to the Applicant as early as June 2024 the severe disruption which could be caused by interference with access to its factory, we are surprised and disappointed that the Applicant has not only not provided its optioning study on the cable route options, but it has not even completed the surveys needed to evaluate those options. 17. In our view, the cable routes are an integral part of assessing the impact of the project as a whole. It is late in the day, the Examination having begun, for the Applicant not to have provided the final design of its routes. We request that the Applicant provides the final design as soon as possible. 18. We request that the Applicant places the highest priority upon providing Siemens with the optioning study. The Applicant should also provide full details of the investigations including surveys it has carried out on the Cassington Road route so that the Examiner and Siemens are made aware of the nature of any alleged impediments to the adoption of that route. Compensation 19. By engaging with the Applicant at the earliest opportunity and taking part in this Examination, Siemens is making all reasonable efforts to avoid the eventuality, but if the Applicant's exercise of rights of access over Wharf Road interrupt the operation of the business Siemens will be entitled to full compensation for any loss it suffers, both injurious affection (diminution in the value of its land) and disturbance (business losses). Given the potentially calamitous impact interruption to access could cause to Siemens' supply chain (as explained at paragraph 10 above) this could represent a very ,substantial liability for the Applicant. 20. We request that the Applicant provides Siemens with details of the advice it has taken in regard to compensation liabilities and the funding it has available to meet those liabilities. Conclusion 21. In conclusion, Siemens Healthcare Limited, as a major employer and critical manufacturer in the west Oxford area, has significant concerns about the proposed DCO application's potential impact on their manufacturing operations. It believes that given the disproportionate harm use of Wharf Road for cabling could cause, rights over Siemen's land should be removed from the DCO. 22. In the first instance, Siemens requests that the Applicant provides the following information as discussed above: a) Final design of cabling routes. b) Route optioning study c) Full details of investigations and surveys informing selection of preferred route d) Details of compensation advice received e) Applicant's funding of compensation liabilities 23. Siemens will wish to make further written representations and raise further questions during the Examination.	has been requested with Siemens and their advisors to be able to continue to progress this matter as soon as possible. It should be noted that the remainder of the cable route which runs through the Affected Parties title falls within Adopted Highway, and agreements are being negotiated with the Local Authority Highway team to secure the relevant permits. The Applicant must retain the flexibility for the remaining cable route options as ongoing investigations continue from a technical, engineering, environmental and landowner perspective.	
REP1-120	Stop Botley West	Residential Amenity 2.3.1 Section 3.7 of our Relevant Representations outlines our concerns regarding the impact of the proposed development on residential amenity. While we do not repeat those points in full here, Appendix 5 provides further detail on several properties where amenity and outlook would be notably affected. In our RRs, we raised the point about inadequate buffer zones to residential properties and that the information in Appendix 5 sets out the implications of that. 2.3.2 Appendix 5 sets out the number of residential properties likely to be impacted and includes a selection of representative case studies demonstrating how the proposed development would alter the immediate outlook from both gardens and internal living spaces. 2.3.3 These examples help to highlight the overall scale and reach of the scheme,	The Applicant welcomes the representations and feedback from Stop Botley West. The Applicant believes that the 25-metre buffer zone to residences is sufficient mitigation. Chapter 8 of the ES, Landscape and Visual Impact Assessment **[APP-045]** sets out a detailed assessment of the significant effects of the Project upon landscape resources and visual receptors.	Community Benefits and Impacts

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		illustrating how it would materially alter the visual and environmental experience of residents living near the site. 2.3.4 SBW are collating a community impact report which will be included in future submissions and will contain further information about residential amenity impacts.		
REP1-120	Stop Botley West	2.1.2 A key concern is the impact of the central section of the application site on the Blenheim Palace WHS (National Heritage List for England (NHLE) reference 1000091), which is recognised internationally for its Outstanding Universal Value (OUV). The proposals would also harm the significance of the associated Grade I Registered Park and Garden (NHLE 1000434) and the Grade I listed Blenheim Palace itself (NHLE 1052912). This part of the landscape is fundamental to the WHS's setting, and the development would introduce large-scale, visually intrusive infrastructure into a sensitive, historically legible, and culturally significant environment.	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'. 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*'. With regard to impacts arising from the change within the settings of other designated heritage assets, the Applicant considers that the assessment of impacts and effects as set out in the Revision 1 version of the Settings Assessment **[EN010147/APP/6.5]** submitted at Deadline 2 is robust and accurate. The assessment has been undertaken in accordance with the appropriate guidance, specifically the Historic England 2017 document Setting of Heritage Assets.	Historic Environment
REP1-120	Stop Botley West	2.1.3 The Inspectors have rightly requested that the Applicant submit a number of important heritage-related documents, including the Blenheim Palace WHS Management Plan (2017) and all associated appendices, the UNESCO/ICOMOS Guidance and Toolkit for Impact Assessments in a World Heritage Context, Conservation Area Appraisals for Bladon, Cassington and Begbroke, the Heritage Mapbook, and the Archaeological Evaluation Report. That the scheme has been progressed without full reference to these critical documents is concerning and further underscores the inadequacy of the heritage assessment and project design process. The failure to integrate the WHS Management Plan and relevant guidance into the assessment framework demonstrates a lack of alignment with national policy objectives concerning the conservation of heritage significance and the delivery of high-quality, context-sensitive design.	Stop Botley West appear to have misunderstood the nature of the request from the ExA regarding the submission of these documents into the Examination. All of these documents (with the exception of the archaeological evaluation reports) were utilised and referenced within the Applicant's assessment of likely effects on the historic environment, hence the request from the ExA that copies of the documents should be submitted into the Examination. Archaeological 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
REP1-120	Stop Botley West	2.1.4 In relation to the Applicant's reliance on the enclosed and self-contained nature of the Blenheim Palace World Heritage Site (WHS) as the basis for concluding that there would be no material heritage impact. Whilst it is accepted that views into and out of the WHS may be limited due to its self-contained nature, the assumption that this precludes harm to setting overlooks the broader spatial and cultural relationship between the WHS and its surrounding landscape. This establishes that the significance of Blenheim Palace and its heritage assets extends beyond visual connections alone. The World Heritage Site's influence and historic role in shaping the wider agricultural landscape forms part of its setting and significance. The Botley West Solar Farm proposals, by introducing a large-scale industrial land use into that wider setting, would result in a fundamental change in character, development pattern, and land use. These risks undermining the historic coherence between the WHS and its rural estate context — a relationship which is explored in greater detail from page 6 onwards of the Management Plan.	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 assessment included a review of the impacts arising from changes within the wider setting of the WHS and was not restricted to any visual connections. The assessed level of harm on one of the defined attributes that contribute to the OUV is 'minor negative'.	Historic Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		2.1.7 We consider that the Applicant's assessment fails to address this issue with sufficient rigour. In our view, the effect of the proposals on the wider setting of the WHS should be re-examined, not only in terms of visibility but with proper regard to changes in land use character, coherence, and historic association.		
REP1-120	Stop Botley West	Public Rights of Way & Mitigation Measures: 2.2.8 We note that significant objection has been raised by the Ramblers Association in relation to the impact of the scheme on the enjoyment and use of the public footpath network. They note that the sheer scale of the proposed development is likely to diminish the recreational value of walking along these routes. The open and rural setting of many of the footpaths contributes significantly to the wellbeing benefits associated with countryside access. The transformation of this landscape into a semi-industrial environment enclosed by fencing and bordered by newly planted hedgerows would fundamentally alter the character of the setting through which walkers move. This, in turn, is likely to reduce the use of the PRoWs and undermine their social and health-related value. We agree with this assessment and endorse it to the ExA.	The main change caused by the Proposed Development would be the loss of the existing open aspect view of agricultural fields. However, the existing surrounding vegetation would be retained, with several sections of the route extending along and through the existing vegetation. The main effects would occur within short sections along a number of PRoW routes affected by the Project. Particularly PRoW 416/5/10 and 416/5/20, where it would pass or cross the Site. The scale of change attributable to the Proposed Development is considered to be high magnitude on completion, as the experience of users of the route would be substantially changed. However, the high magnitude of change experienced would not be prevalent along the route but would be mainly related to specific sections. Therefore, these effects are of a local scale and the magnitude of change is considered Medium-low, resulting in Moderate, localised and not significant effects in the long term. Over time, as the proposed vegetation (hedgerows and hedgerow trees) reach maturity, they would provide increased screening and mitigate the visual effects to some extent. Although the proposed vegetation would not compensate for the loss of the open aspect, it is considered that the permanent effects would reduce to Low-negligible magnitude, resulting in **Minor/negligible,** not significant, neutral effects given the enhancements proposed given the enhancements proposed. The overall effects upon the 5 km long route would be negligible. The LVIA chapter of the ES concludes there would be significant effects on users of public rights of way within or immediately adjacent to the Project during operation and maintenance, at completion. By Year 15, once planting matures, these effects would not be significant. Public rights of way flanked by hedgerows and / or trees is characteristic elements in of the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and, in places, green corridor. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wider green corridor not uncharacteristic of the current situation and existing landscape. Additionally, new permissive footpath and cycle path routes would be created by the Project. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. For example, between Bladon and Campsfield.	Landscape and Visual Impacts
REP1-120	Stop Botley West	2.2.6 The proposed development would result in significant adverse effects on the landscape due in large part to an inadequate understanding of the site's local character and the absence of a sensitive, location-specific design approach. Oxfordshire County Council has identified a critical shortcoming in the Landscape and Visual Impact Assessment (LVIA) submitted by the Applicant **[APP-045]**, namely that it fails to explain how the findings of local landscape character assessments have informed either site selection or the detailed design and mitigation strategy. 2.2.7 Rather than reflecting the nuanced differences in landscape quality and receptor sensitivity across the extensive site, the mitigation proposals—largely limited to standardised hedge and tree planting—have the potential to fragment the landscape and detract from the open, scenic qualifies of the landscape. This is particularly problematic where PRoWs pass through or alongside the development area. In such cases, mitigation needs to do more than screen views; it must respect the open, rural context and preserve the experiential quality of routes that are valued by local communities for recreation and access to the countryside. There is no clear evidence that this has been achieved. We suggest the EXa consider the apparent inconsistency between the Applicant's claim that the development is "temporary" and the proposed mitigation strategy. During the May hearings, the Applicant confirmed in response to a question from the ExA that the hedge and tree planting intended for visual mitigation would not be removed following decommissioning. This implies that the resulting screening and associated fragmentation of the landscape would, in fact, be permanent. This undermines the temporary nature of the scheme as presented, and we believe it warrants further scrutiny.	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment **[APP-045]**. The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan **[APP_062]**. The project is considered fully reversible, unlike residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries, which provide structure to the landscape, would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed. The Landscape and Visual Impact Assessment **[APP-045]**, includes an assessment of cumulative effects at section 8.11. The Parish of Cumnor, for example, in common with other areas within which the Project is located, is a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. Thirty-three photomontages have been produced as part of the application **[APP-072 to 080]**. These demonstrate the impacts of the Project and illustrate that the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours. Existing public rights of way would be retained and have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. As such, the public's access would not be restricted. Landscapes are not 'preserved in aspic' they are dynamic and ever-changing. Areas within the wider landscape, around the Project are rapidly changing, with agricultural fields in certain areas that have been / are being planted as woodland, as part of the Blenheim Estate's wider vision for the area, or	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			the establishment of the Salt Cross/Eynsham Vale garden village, to the north of the A40 and Eynsham, on agricultural land. Project Impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP_228]**. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays. Designed in mitigation including areas of woodland and lengths of hedgerow will, over time, maintain and enhance the natural connectivity with existing areas of planting and those which have been implemented by others. Such as extensive areas of woodland planting within Blenheim Palace Estate land.	
REP1-120	Stop Botley West	2.2.9 The Applicant's assumption that the visual impact of the scheme will be acceptably mitigated over time by hedgerow planting ignores the reality that the change in land use and landscape character will be immediate, pronounced and ensuring across a significant timescale. The replacement of arable fields with extensive tracts of solar infrastructure and security fencing introduces a semi-industrialised landscape into an otherwise agricultural and tranquil setting. This transition will be particularly stark for PRoWs that traverse or border the site, where users would be exposed to uninterrupted views of solar panels, fencing, and infrastructure, often at close quarters. 2.2.10 Moreover, there is little evidence that the design process has given serious attention to the experience of local communities and recreational users. The approach to mitigation lacks the refinement required for a scheme of this scale and sensitivity. By focusing narrowly on visual screening, the Applicant has failed to engage with the wider experiential qualities of the landscape or with the importance of maintaining rural tranquillity and openness—qualities that are highly valued by local residents and visitors. 2.2.11 We conclude that development would fundamentally alter the landscape character of the area—from one of open, rural, arable farmland to a semi-industrialised energy-generating landscape for the lifetime of the project. The cumulative extent and intensity of solar arrays, fencing, infrastructure, and access roads across the site would result in a highly engineered and incongruous landscape typology, inconsistent with local character.	Please refer to the Applicant's response to REP1-114 in **[EN010147/APP/12.5]** and all other Stop Botley West WRs **[EN010147/APP/12.4]**.	Landscape and Visual Impacts
REP1-120	Stop Botley West	Landscape Impact Conclusion: 2.2.12 The approach to landscape and visual impact within the Botley West Solar Farm application raises significant concerns when considered against national policy requirements. These make clear that careful consideration of siting and project design is fundamental to minimising adverse landscape and visual effects. It is expected that these matters are addressed proactively through an iterative design process and that applicants take steps to integrate effective mitigation measures from the outset. 2.2.13 In the case of Botley West, it is apparent that while the Applicant did undertake some preliminary work in identifying the site, there is no evidence that landscape and visual constraints were a key driver in that process. This lack of upfront rigour in both site selection and design evolution has led to a reactive approach to mitigation. As a result, the measures proposed appear belated and fail to demonstrate that the mitigation hierarchy has been followed. 2.2.14 The sheer scale and fragmented configuration of the Botley West proposals, coupled with their proximity to multiple settlements, will result in widespread and significant adverse effects on people's perception of their environment. These effects are compounded by the erosion of rural character across a large tract of countryside. Such outcomes are in clear conflict with the principles of good design embedded within EN-1, which requires sensitivity to place and the avoidance of harm where possible. 2.2.15 The dispersed layout of the Botley West Solar Farm across multiple land parcels and its expansive footprint in close proximity to a number of settlements would materially harm landscape character and visual amenity. Rather than being a coherent and integrated scheme, the application is characterised by fragmentation and spatial intrusion. This pattern of development is not conducive to good design and should weigh heavily against the proposal when considered in the planning balance. 2.2.16 The proposed shift from an open, agricultural landscape to a semi-industrialised energy landscape will be acutely felt by both residents and users of the countryside, including walkers and recreational users. The increased sense of enclosure and loss of open views will diminish the ability to enjoy and appreciate the rural setting. Whilst the Applicant has proposed some screening through	The effect of the Project on potentially significantly affected landscape and visual resources and receptors are assessed in section 8.9 of the LVIA **[APP-045]**. The Applicant has adapted the extent of the solar farm and increased distances from potentially sensitive receptors. The Applicant has also increased the amount of landscape mitigation, thereby minimising adverse effects on landscape and visual receptors, in line with the guidance in National Policy Statement EN-1 and EN-3 (see response to RR-870-005 and 0793-005, above). Hedgerows have been proposed as part of the landscape mitigation proposals, as shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. These will be managed to a height of 3m to 4m, as specified in the outline LEMP. Existing hedgerows will be reinforced and managed to a height of 3m to 4m. This will be sufficient for close views to be screened. More distant views on rising land will be available and this is acknowledged in the LVIA. There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology within the Landscape and Visual Impact Assessment **[APP-045]** to support those judgements. All the landscape consultants that have worked/are working on the project are Chartered Members of the Landscape Institute and experienced in the assessment of solar farms within this type of landscape.	Landscape and Visual Impacts

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		additional hedgerow and tree planting, this would deliver only limited mitigation at a very localised scale and would itself alter the wider character of the landscape in ways that are not necessarily beneficial or contextually appropriate. 2.2.17 The Applicant has not demonstrated that the proposed mitigation is proportionate or adequate in the context of national policy requirements. Indeed, the reliance on standardised buffers suggests a failure to fully understand and respond to the local landscape context. The scheme as a whole marks a fundamental and irreversible change in land use over a vast area, in close proximity to approximately 15 separate settlements. This extent and intensity of development sets Botley West apart from other solar proposals and serves only to emphasise the failure of the siting and design process to meaningfully minimise harm.		
REP1-120	Stop Botley West	Green Belt 2.2.1 The proposed development would result in substantial and enduring harm to the character and openness of the landscape, particularly where it falls within the Oxford Green Belt. One of the five purposes of the Green Belt, as set out in national policy and reaffirmed through adopted local plans, is to prevent the coalescence of settlements. The proposals before the Examining Authority clearly conflict with this fundamental objective. Of particular concern is the narrow remaining gap of undeveloped land between Begbroke and Kidlington, notably around the corner of the A44 and Langford Lane. This is the last open green field in this location, and the introduction of solar arrays here would effectively erode the physical and visual separation between these settlements, undermining the spatial integrity of the Green Belt. 2.2.2 In our RRs, we also raised concern about the urbanisation of significant tracts of Green Belt between settlements resulting in the erosion of long established gaps between settlements – including between Long Hanborough/Bladon and Bladon/Begbroke). 2.2.3 Cherwell District Council has rightly highlighted this conflict with Policy ESD 14 of the Cherwell Local Plan and saved Policy C15 of the 1996 Plan. Although the Applicant has acknowledged proximity between certain settlements such as Begbroke and Bladon in its Planning Supporting Statement, it has failed to recognise or assess the much more immediate and sensitive relationship between Begbroke and Kidlington. 2.2.4 We previously submitted extracts from the Green Belt study with our Relevant Representations which demonstrate that the affected areas perform a high-functioning Green Belt role. The proposed solar development would infill narrow, highly sensitive gaps between settlements and, by doing so, undermine the core spatial purposes for which the Green Belt is designated – to retain the separate identities of settlements. Whilst it is acknowledged that development plans do not determine the outcome of a DCO examination, all three host authorities have declared climate emergencies and established policy frameworks to support renewable energy infrastructure. In West Oxfordshire's case, however, the local approach clearly advocates for a landscape-led assessment of siting, scale, and community support—criteria that have not been adequately addressed in the current proposal (Policy EH6 of the West Oxfordshire Local Plan adopted in 2018).	The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Botley West Solar Farm **[REP1-012]**. At Appendix 8 to the PSS is the Very Special Circumstances (VSC) case in respect of that part of the Project that falls within the Oxfordshire Green Belt. That VSC approach and weight to be attached to relevant factors accords with the requirements of NPS EN-1 section 5.11 and, in particular, para 5.11.37. The overriding policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test. Arguably, because of this policy, the Applicant need not have made a VSC case. However, in the event that the ExA did not take that view, the Applicant has submitted a VSC case in the hope and expectation that the ExA and SofS will confirm that the test has been met in line with policy. Specific responses: **2.2.1 to 2.2.4** The issue of the gap between the villages of Begbroke and Kidlington and other gaps is noted, and the Applicants response to paragraphs 3.2.5, 3.2.6 and 3.2.8 has dealt with this and related matters concerning the new approach to understanding Green Belt function. However, in addition, the Applicant wishes to draw to the attention of the IP and the ExA that the land parcel between Begbroke and Kidlington is likely to be the subject of a further Change request from the Applicant, which is likely to remove solar PV arrays in this area.	Green Belt
REP1-126	Thames Water Top of Form	Further in relation to Farmoor Reservoir, there are concerns around the proposed location of the substation, being in close proximity to the embankment of the reservoir (which is a statutory reservoir regulated under the Reservoirs Act 1975). The construction of a substantial foundation in this area has the potential to impact the integrity and safety of the reservoir embankment and given the importance of reservoir safety, the following matters must be addressed by the Applicant in advance of any construction proceeding: i. TWUL's reservoir safety team must review and approve all proposed excavation works associated with the substation, given their proximity to the embankment; ii. detailed plans and cross-sectional drawings of the proposed substation and its foundation must be provided to TWUL for review; iii. full details of all materials, plant and equipment proposed for use in the construction of the substation must be submitted to TWUL for assessment; and iv. any proposed access restrictions to the reservoir, including during the construction phase, must be clearly set out in writing and provided to TWUL for approval. Due to Farmoor Reservoir being a statutory reservoir, there are significant legal and operational impacts that will arise as a result of the failure of the Applicant to adequately consider the impacts of the proposed scheme. TWUL submits that no work may proceed in this area until the reservoir safety team has	The Applicant and Thames Water are in discussions over a set of protective provisions to ensure that Thames Water's apparatus is sufficiently protected. In the meantime, a draft form of protective provisions is secured under Part 5 of Schedule 15 of the draft DCO. The protective provisions will include provisions regarding the submission and approval of plans for works that may impact Thames Water's apparatus. As defined in the existing draft set of protective provisions, the scope of the 'plans' to be submitted for approval is broad and includes "*all designs, drawings, specifications, method statements, programmes, calculations, risk assessments and other documents that are reasonably necessary properly and sufficiently to describe the works to be executed*". The protective provisions also deal with access. For example, paragraph 4(2) in the draft protective provisions confirms that *"the utility undertaker is at liberty at all times to take all necessary access across any such stopped up highway and to execute and do all such works and things in, upon or under any such highway as may be reasonably necessary or desirable to enable it to maintain any apparatus which at the time of the stopping up or diversion was in that highway*". The Applicant anticipates that an agreed form of provisions will be agreed before the close of Examination and the DCO will be updated accordingly.	Construction period and methods

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		formally reviewed and approved the proposals and as such, TWUL is keen to engage with the Applicant on all issues in relation to Farmoor Reservoir. However, no progress has been made since the submission of TWUL's RRs.		
REP1-126	Thames Water Top of Form	In its RRs, TWUL noted that it requires a thorough review of the Applicant's outline infrastructure drainage strategy to understand the full impact of the scheme, but this is yet to be submitted. Should the Applicant wish to connect to TWUL's foul or surface water networks, a pre-development inquiry must conÞrm network capacity and additionally, TWUL requests that it is a consultee for Requirement 9 whereby details of the surface water drainage works and (if any) foul water drainage system are submitted for approval. TWUL has not received any correspondence from the Applicant on this issue.	As provided as part of the relevant representation response, no connection is proposed to Thames Water foul or surface water sewer networks. A high-level Conceptual Drainage Strategy **[APP-167]** has been submitted as part of the DCO application. This document sets out the proposed surface water drainage approach across all infrastructure areas. There will be no connection to the local foul or surface water Thames Water drainage network. The strategy incorporates Sustainable Drainage Systems (SuDS), including: • Gravel-filled infiltration trenches: proposed for each PCS unit and HV Transformer • Detention basins: proposed at the Applicant and NGET Substations to manage runoff • Vegetated filter strips: planned between and beneath PV module rows to slow runoff and support infiltration These measures are designed to attenuate runoff in accordance with greenfield discharge rates and a 1-in-100-year storm event plus 25% climate change uplift, in line with Environment Agency guidance. At this stage, the strategy is supported by indicative calculations only, based on maximum design assumptions. A detailed drainage layout with identified discharge points will be developed post-consent, during the detailed design phase, following site-specific infiltration testing.	Hydrology and Flood risk
REP1-126	Thames Water Top of Form	Due to concerns surrounding potential adverse impacts on the operations of the Farmoor Reservoir, alongside its environmental and community value (being a sensitive recreational and ecological site), TWUL submitted in its RRs that the construction activities near Farmoor Reservoir must include bespoke method statements to mitigate noise, vibration and other disturbances. At present, some concerns in relation to this area include: i. impacts on recreational users of the reservoir, including anglers, sailors and walkers; ii. iii. protection of the reservoir's natural state and nearby nature reserves, including Pinkhill Meadow, Shrike Meadow and Buckthorn Meadow; protection of wildlife, particularly birds, which enhance the area's appeal; and iv. access for all users to continue enjoying the facilities of the reservoir.	A construction Management Plan accompanies the application (7.6.1 - Outline Code of Construction Practice – APP-233). This management plan includes measures to limit construction noise and vibration from the construction works. These measures will also control noise and vibration emissions on users of Farmoor Reservoir therefore a bespoke method statement is not required.	Noise and Vibration Impact
REP1-126	Thames Water Utilities Limited	Since the submission of the RRs, there has been minimal contact with the Applicant or its legal representatives. In terms of the substantive issues raised (which are reiterated below), no progress has been made since the date of the RRs and TWUL is keen to engage with the Applicant to resolve these issues collaboratively.	The Applicant welcomes the feedback and willingness to engage from TWUL and is committed to engaging with TWUL further on any outstanding matters raised so that these can be resolved. The Applicant has been in contact with Thames Water's legal representatives and continues to engage in relation to agreeing protective provisions, which are currently with Thames Water to provide comments.	DCO Process
REP1-126	Thames Water Utilities Limited	TWUL is concerned about the degree of asset protection which has been provided for under the draft Development Consent Order ("dDCO"). TWUL requires the Applicant's compliance with TWUL's "Guidance For Working Near Our Assets" document and seeks clarification as to whether the Applicant would be considered a utility undertaker under the National Joint Utilities Guidelines. TWUL is yet to understand what developments have been made in relation to these issues.	TWUL has been identified as a relevant utility undertaker for the Project, and the Applicant has included draft protective provisions for TWUL to manage potential impacts on TWUL assets from the Project. The Applicant will continue to engage with TWUL on the protective provisions and any agreed changes will be incorporated into the draft Development Consent Order in due course. The latest draft protective provisions are currently with Thames Water for review and comment.	DCO Process
REP1-126	Thames Water Utilities Limited	TWUL and the Applicant are yet to agree a suitable form of protective provisions for inclusion in the dDCO, primarily to safeguard TWUL's assets. Despite the fact that discussions between TWUL's legal representatives and the Applicant's legal team remain ongoing, there has been a lack of progress since the submission of TWUL's RRs. This is due to the fact that the Applicant's legal team are yet to provide an updated undertaking for negotiations to continue and TWUL keenly awaits this to proceed.	The Applicant acknowledges this and will continue to engage with TWUL on the protective provisions, including the matter of an updated undertaking. Any agreed changes will be incorporated into the draft Development Consent Order in due course. The latest draft protective provisions are currently with Thames Water for review and comment.	Legal
REP1-128	Worton Farms Ltd	Flooding: we have experienced a number of flooding events which have affected the estate. The origin of the floods being water run-off from the land that borders us, namely spring hill. This land, forms part of the solar proposal. However, Botley West don't seem to have recognised our site as a flood risk. As a result, we commissioned a Flood Risk Appraisal; the report was produced by LDE (a RSK Company). A copy of the report is attached. It concludes: "Any localised increased in runoff, or altera on to land drainage patterns could potentially serve to exacerbate the existing flood risk situation, potentially impacting the Worton Park access road and adjacent residential properties." "Whilst some preliminary environmental documentation is available on the Botley West Solar Farm website, there is currently no specific mention of this land parcel, or indication that this	We note the existing flood risk off-site at Worton Farms Ltd, we have reviewed the report produced by LDE (a RSK Company) and this is included as part of the DL2 submission, reference: Appendix 3: Flood Risk Technical Note - Worton Park v1.	Hydrology and Flood risk

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		specific area has been fully investigated with respect to the known flood risk history to the land itself, the Yarnton Road, or Worton Park site access road. It is noted, however, that under the National Planning Policy Framework, the proposals should not be given consent if there is any potential increase in flood risk offsite." Our site is undoubtably a flood risk. Botley West have failed to properly investigate this risk.		

2.3 Public/Landowner

Table 2.3: Applicant's Responses to Written Representations provided at Deadline 1 – Public/Landowner

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-131	Bojan Ivanovic	The developer's key claim that Botley West will provide "840 MW of clean, affordable power to the National Grid, providing enough electricity for the equivalent of 330,000 homes" is clearly misleading. Yet, this claim has remained unchanged for two years, and the government has not required the developer to correct or clarify it. The public is NOT being told that 840 MW figure refers to 'installed' capacity, not actual generation. In the UK, solar farms typically produce only 10–12% of their capacity on average due to weather variability and the absence of nighttime production. Output during winter months is substantially lower. Without energy storage or grid balancing, which this project lacks, the system cannot reliably supply power to the claimed number of homes, especially during peak demand. So the "homes powered" figure is simply marketing and political spin, not an operational fact. Furthermore, despite written requests, the developer has failed to provide hourly or seasonal output data, or real-world performance examples from comparable UK solar farms. This refusal suggests an awareness that such data would expose intentional public manipulation. Given that my written requests have been ignored, I ask: what procedural steps can the Inspectorate take to compel the developer to provide this critical data? The government has a duty to ensure public information is accurate and transparent, especially on matters of national energy infrastructure.	Chapter 6: Project Description **[APP 043]** confirms that the proposed development seeks consent for an export capacity of up to 840 MWe (AC), with a peak DC module capacity of up to 1,375 MWp, and an indicative maximum of 2.2 million PV modules. The 840 MW referenced for Botley West represents its Transmission Entry Capacity (TEC), the maximum amount of electricity the solar farm is permitted to supply to the National Grid under the terms of our connection agreement. To deliver this capacity reliably, Botley West will be designed to generate approximately 890 MW, accounting for transmission losses and the provision of any ancillary electrical services requested by National Grid. To estimate the total annual energy output, we apply a series of technical conversion factors: a power utility factor (to reflect efficiency losses), an oversizing factor (to account for the ratio of DC to AC capacity), and a specific yield estimate (representing expected annual energy generation per unit of installed DC capacity). These adjustments enable us to convert installed generation capacity into an estimate of deliverable electricity, measured in kilowatt-hours (kWh), the standard metric used to express household energy consumption. Based on this methodology, Botley West is projected to generate approximately 1,256,539,474 kWh annually. To contextualise this output in terms of domestic energy use, we reference official statistics from the Department for Business, Energy & Industrial Strategy (BEIS), which indicate that the average UK household consumes 3,731 kWh per year. Using this figure, Botley West's output would be sufficient to meet the annual electricity needs of approximately 336,784 households. The underlying calculation is as follows: 840 MW = 840,000 kW (AC feed-in capacity) 840,000 kW + 50,000 kW (AC losses/network compensation) = 890,000 kW 890,000 kW / 0.95 (Power Utility Factor) = 936,842 kVA 936,842 kVA × 1.45 (Oversizing Factor DC/AC) = 1,358,421 kWp 1,358,421 kWp × 925 (Specific Yield) = 1,256,539,474 kWh 1,256,539,474 kWh / 3,731 kWh = 336,784 households	Principles of Solar Development and Amount of Electricity Generated
REP1-131	Bojan Ivanovic	In addition to increased flood risk, visual pollution from large-scale solar developments as a legitimate concern not only in terms of mental health and community well-being, but also as a tangible financial issue—particularly in relation to impacts on local property values. Specifically, I would like to know whether the Inspectorate acknowledges the findings of the 2018 study by the London School of Economics, which analysed over 600 solar farms and 5,000 nearby properties. The study concluded that proximity to large solar farms may reduce nearby property values by approximately 4% to 6%, and that the size of the installation has a greater impact on property prices than its energy-generating capacity. When will we know if the Inspectorate will recognise 'visual pollution' from large-scale solar farms as a legitimate issue not only in terms of community wellbeing and mental health, but also in terms of potential financial harm, particularly to local property values? Are you aware of the 2018 study by the London School of Economics, which analysed over 600 solar farms and 5,000 nearby properties, concluding that proximity to large solar farms can reduce property values by approximately 4% to 6%?	The Socio Economics ES Chapter **[APP-052]** references a UK study ('Is NIMBYism Standing in the Way of the Clean Energy Transition?' Jarvis, 2021) which found no clear evidence of an effect on residential property values from solar Projects in the UK. The value of individual properties is not, in any case, a material planning consideration.	Socio economics
REP1-131	Bojan Ivanovic	I understand that current planning regulations in the UK do not permit developments that increase flooding risks, for obvious reasons. Normally, Oxfordshire County Council would be responsible for informing the Planning Inspectorate about the likely impact of the proposed Botley West Solar Farm on local flood risk. As I am not sure that they have and will do so, I have already submitted my own photographic evidence to you taken in Worton from the Jericho Farm Barns driveway along Yarnton Road towards Cassington, clearly documenting a flash flood event that resulted in the closure of our community foul water treatment facility. This establishes that flood risk in the Worton and Cassington areas is neither theoretical nor	We note the existing flood risk off-site at Worton Farms Ltd, we have reviewed the report produced by LDE (a RSK Company), and this is included as part of the DL2 submission, reference: Appendix 3: Flood Risk Technical Note - Worton Park v1 . Similarly we note that there is an existing flood risk to surrounding areas. The National Planning Policy Framework (NPPF) prioritises avoiding development in areas with high flood risk and ensuring that any development in flood-prone areas is safe for its lifetime and does not increase flood risk elsewhere. It has been demonstrated through 6.5 ES - Appendix 10.1 Flood Risk Assessment **[APP-166]**	Hydrology and Flood risk

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		speculative—it is a recurrent and demonstrable issue. The elevated, Blenheim-owned terrain above Yarnton Road that acts as a natural funnel—verifiable through Google Earth—has directly contributed to previous flooding incidents, causing disruption to essential infrastructure and public access routes. The proposed solar installation on this sloped ground, adjacent to Jericho and Worton Farms, would dangerously further impair the land's natural infiltration capacity. This, when combined with poorly maintained drainage infrastructure, including obstructed ditches and undersized culverts, would materially increase surface runoff into already flood-prone areas. This proposed development in my immediate vicinity therefore poses a foreseeable and significant aggravation of an existing flood hazard, with direct implications for residential safety, public health, and infrastructure resilience. Accordingly, I request clarification from the inspectorate: does the submitted photographic evidence suffice to establish the seriousness of this risk, or will additional documentation be required? If the latter, please specify what further evidence is deemed necessary and when that determination will be communicated.	that the Proposed Development has been sequentially steered from areas of flood risk and has been appropriately managed. We understand there is concern regarding existing field drainage and culverts. The inclusion of pre-works and post-works surveys of flood assets, including field drainage, will be added as a commitment to an updated 6.3 – ES Chapter 10 - Hydrology and Flood Risk **[APP-047]** as embedded mitigation, to be submitted at DL3. This commitment will also ensure that field drainage is restored for the operational life of the development.	
REP1-131	Bojan Ivanovic	I am now concerned that, as an individual without expensive legal representation, my voice will be drowned out amid the complex exchanges between larger, better-resourced parties—particularly if my contributions do not conform precisely to internal bureaucratic form and expectations.	The Applicant has had regard throughout the consultation process to both organisations and local residents. Chapter 11 of the Consultation Report **[APP-24]** describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by Appendix 033 - Section 47 Applicant Response **[APP-033]**.	Consultation Process
REP1-131	Bojan Ivanovic	I must also respectfully request that the Inspectorate clarify its preliminary position as to whether the proposed 40-year project term is being treated as a procedural matter or a merit based one—since it plainly implicates both. From a procedural perspective, such an unusually long duration should have immediately attracted heightened scrutiny during the NSIP eligibility assessment, particularly as it amounts to a de facto permanent rezoning—without any candid acknowledgment of that effect. The failure to thoroughly assess and transparently address these protections at the earliest stages of the process constitutes a serious procedural and substantive oversight, undermining the statutory purpose and public confidence in the Green Belt policy framework. A 40-year industrial-scale energy installation cannot reasonably be described as "temporary." This conflation of procedural leniency with substantive approval risks rendering the statutory safeguards meaningless.	The Applicant notes the IP's procedural points made requesting the PINs to clarify its position. This is not a matter for the Applicant. From a planning perspective, the project is temporary and reversible but bringing substantial benefits during its operation (principally renewable energy generation) and post decommissioning in terms of an enduring landscape, ecological and amenity benefit.	Green Belt
REP1-132	Bojan Ivanovic	I write as a local resident and interested party to raise serious objection to any suggestion that the proposed Botley West Solar Farm — a project of unprecedented scale in the Oxford Green Belt, spanning a land area comparable to Heathrow Airport — can be lawfully or meaningfully classified as "temporary" development. Moreover, the developer's claims of "very special circumstances" — the ONLY legal basis on which inappropriate development may be permitted in the Green Belt — are unconvincing, extremely vague, high-level, and completely unsubstantiated.	From a planning perspective the project is temporary and reversible. The Applicant has set out an appropriate VSC case but notwithstanding the IP should note that the overriding government policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. "...the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test...". The response to **[REP1-114]** sets out further details in this regard.	Green Belt
REP1-132	Bojan Ivanovic	A 40-Year Development Is Not Temporary in Any Practical or Legal Sense A project of this scale and duration will dominate the landscape for two generations, removing vast tracts of open countryside from public, ecological, and agricultural use. With roads, fencing, substations and solar infrastructure in place for 40 years, this development will functionally and visually urbanise Green Belt land for the lifetime of most residents.	From a planning perspective the project is temporary and reversible but will bring substantial benefits during its operation (principally renewable energy generation) and post decommissioning in terms of an enduring landscape, ecological and amenity benefit. The Applicant notes the IP's concerns, but the Project will bring with it 'two generations' worth of renewable energy benefit, retain an agricultural use of most of the land, increase public access to the area and considerably enhance the sites biodiversity value. The Applicant is of the view that VSC exist and outweigh any harm caused.	Green Belt
REP1-132	Bojan Ivanovic	2. High Court Case Law – Dillon v Secretary of State [2010] The High Court in Dillon v Secretary of State for Communities and Local Government [2010] EWHC 1085 (Admin) made it clear that so-called temporary developments still require full assessment under Green Belt policy, stating: "The temporary nature of a permission does not negate the requirement to assess the actual harm to the Green Belt." Even where a proposed use is time-limited, the real-world impact on openness, landscape character, and Green Belt purposes must be fully and rigorously examined.	The Applicant has set out a detailed planning case including an assessment of impact upon the Green Belt **[Appendix 8 of REP1-012]**. An appropriate VSC case has been made out but notwithstanding the IP should note that the overriding government policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. "...the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test..." In addition, unlike some other solar farms, Botley West is temporary and reversible.	Green Belt
REP1-131	Bojan Ivanovic	Rather than pursuing local planning approval for each parcel individually, Blenheim and its affiliates deliberately aggregated over two dozen non-contiguous land parcels—connected only by cabling and common ownership—into a single NSIP application. This manoeuvre, and the legal precedent it relies upon, constitutes a blatant manipulation of the planning framework, evident to any objective observer.	The Project has a generating capacity in excess of 50 MW, which means that under section 15 of the Planning Act 2008 it is a Nationally Significant Infrastructure Project that requires an application for a Development Consent Order.	Planning Policy

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		To date, no legal opinions have been submitted to support the validity of this approach, despite multiple written requests, yet the approval process continues to advance along this legally inappropriate path. The failure to address these concerns now undermines proper planning oversight and calls into question the legitimacy of the entire process from the outset. Has the Inspectorate already concluded that such aggregation is acceptable and not an abuse of existing planning procedures? If the aggregation of non-contiguous sites is deemed acceptable merely because they are connected by electricity cables, one must ask: where is the logical boundary? By that reasoning, could all solar panels in the UK, if linked through the grid, be treated as a single nationally significant project? Such a precedent would not only stretch the intent of NSIP legislation but effectively nullify the role of local planning in large-scale energy developments.		
REP1-132	Bojan Ivanovic - Objection	3. Legal Definition of Permanence in Planning Law – Town and Country Planning Act 1990 . The Town and Country Planning Act 1990 further illustrates the legal absurdity of calling a 40-year scheme "temporary." Under the Act, a development becomes immune from enforcement action after: 4 years from substantial completion of building works (Section 171B(1)), or 4 years of unauthorised use as a single dwelling house (Section 171B(2)). In other words, after only 4 years, a development may be deemed de facto permanent for legal purposes. It is therefore INCOHERENT to argue that a 40-year development — TEN TIMES that threshold — does not constitute PERMANENT change in planning terms.	The application for a Development Consent Order for the Project is made under the Planning Act 2008. As identified in the Applicant's Response to Relevant Representations [**REP1-020**] at Section 11, solar farms are generally consented on the basis that they will be time limited in their operation and pursuant to NPS EN-3 paragraph 2.10.65 are therefore "described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed." NPS EN-3 also recognises that an upper limit of 40 years is typical, but that applicants may seek consent without a time-period or for differing time-periods of operation (paragraph 2.10.66). The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any Project. Consent for the Project is sought for 42 years from commencement to decommissioning and removal. The development is not proposed to be permanent, and the lifetime of the Botley West Project aligns with other similar solar farm projects of this scale and type, and which have been consented under the NSIP regime. The Project, as assessed in the EIA process and described in the Environmental Statement, takes this duration into account.	Decommissioning
REP1-132	Bojan Ivanovic	5. Request for Disclosure of Legal Opinions I respectfully request that: a) The Government and Planning Inspectorate confirm whether they have obtained preliminary legal advice on whether a 40-year solar development in the Green Belt can lawfully be treated as "temporary." b) That such advice — or at least a summary — be published in the public interest. c) That the Blenheim Estate (as primary landowner and sponsor) and the developer disclose any legal advice they have procured to support their interpretation of the development as 'temporary'. The legal classification of this scheme is NOT a PROCEDURAL TECHNICALITY — it is FUNDAMENTAL FROM THE OUTSET in determining the correct policy framework, the appropriate planning route (whether through the Nationally Significant Infrastructure Project regime or a more proportionate local planning process), and the rigorous standards that must apply to inappropriate development in the Green Belt.	The Applicant cannot respond to any request relating to legal advice the Government, Planning Inspectorate and Blenheim Estate may have received. The Applicant can confirm that it considers that what has been set out in the DCO Application regarding the treatment of the Project as a temporary activity remains the correct legal position, consistent with a range of comparable solar DCOs, including recently East Yorkshire. The Secretary of State decisions on these DCOs provide precedent that a period of 40 years (or even longer) can be considered temporary.	Legal
REP1-132	Bojan Ivanovic - Objection	This Is a De Facto Rezoning for Private Gain It is plainly evident — even at this 'early' stage — that the true intent behind the Botley West Solar Farm proposal is not the delivery of a time-limited green energy solution, but the PERMANENT transformation of productive Green Belt land into an industrial energy zone, with the resulting exponential uplift in land value accruing primarily to its private sponsors, primarily the Blenheim Estate. This uplift is contingent on the Secretary of State for Energy Security and Net Zero exercising quasi-judicial powers to override local democratic control and planning protections. If allowed, this would amount to a de facto rezoning of Green Belt land — not for essential infrastructure, but for speculative development — creating a precedent whereby the Green Belt becomes a "grey belt" by default. The National Planning Policy Framework is unambiguous: the Green Belt exists to protect the countryside from encroachment and to preserve its openness and permanence. It is clear even at the outset that the Botley West proposal will not achieve this — on the contrary, it threatens to undermine the Green Belt's core purpose and erode its status across England. Crucially, both the Government and the Planning Inspectorate have constructive knowledge of all the above: the relevant statutory framework, the applicable case law (Dillon), and the policy tests embedded in the NPPF.	The Applicant notes the IP's comments and concerns. The Applicant has set out a detailed planning case including an assessment of impact upon the Green Belt **[Appendix 8 of REP1-012]**. An appropriate VSC case has been made out but notwithstanding the IP should note that the overriding government policy as far as VSC in Green Belts is concerned is in NPS EN-1, para 4.2.16 to 4.2.17, i.e. "…the Secretary of State will take as a starting point that CNP infrastructure has met the VSC test..." In addition, unlike some other solar farms, Botley West is temporary and reversible. Grey Belt is a device introduced into planning policy to allow planning authorities to prioritise where development might be directed. As the development is temporary and reversible, the Applicant does not expect Botley West to be classified as Grey Belt by any planning authority. Requirement 14(1) to the draft DCO sets out that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning. The Outline Decommissioning Plan **[APP-236]**, to be approved by the relevant planning authority, is secured in the DCO which means the Applicant is required to comply with it.	Needs Case

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		Given that, it is difficult to understand why there appears to be such determination to push forward a CONTROVERSIAL scheme that runs counter to long-standing legal protections — unless the outcome has been pre-judged or driven by other non-planning considerations.		
REP1-134	Colin Carritt	Active Travel Connectivity. In PVDP's extensive application documentation they say, "Botley West seeks to increase recreational use and access across the site through the creation of new footpaths and cycle paths." But what is shown in the application documentation is entirely inadequate and not always well targeted. The proposed new footpaths and cycleways fail to reflect "active travel desire lines". Recreational walking and cycling are important but active travel must also take account of more utilitarian purposes such as commuting, school and shopping trips. To fulfil this need, direct and quick routes are needed. I have been involved in active travel campaigning for many years and in 2020 I founded the Village Travel Network (VTN) www.vtn.org.uk that covers the communities of Woodstock, Begbroke, Bladon, Hanborough, Combe, Stonesfield, Wootton with Glympton, Tackley and Blenheim. The stated aim is "Bringing villages together to enable sustainable travel, connectivity and networking that enhances community safety, wellbeing, social opportunities and longer term environmental and low carbon benefits". Potential active travel routes in the neighbourhood of these communities, and that lie in or close to the BWSF site envelope include:- 1. National Cycle Network Route 5 Reading to Stratford – a strategic recreational route 2. Woodstock to Tackley and Wootton Active Travel routes within the site envelope but funded through other sources include: - Bladon to Begbroke has recently been improved by Blenheim Estates, - the urgent Eynsham to Hanborough Rail Station route is likely to be financed through a S.106 on the proposed development site at Eynsham and - the long overdue B4044 cycle route between Eynsham and Botley is also the subject of alternative funding arrangements. Appendix A and B provided within the WR.	The Applicant notes this response and continues to liaise with Oxfordshire County Council regarding the provision of active travel within the Project.	Recreation_and_Amenity
REP1-135	Castell Hugh Atherstone	A request to the Examiners, following my previous written submission as an interested party: Noting that the examiners have reported undertaking an unaccompanied walk along public footpaths in the north of the proposed development area, I strongly urge that (if they have not already done so) they should take a walk up 'The Track' (as it is commonly known) behind Cassington towards Purwell Farm - imagining how the route would look if that pathway were bounded on both sides by tall fences and acres of huge solar panels - then to stand at the summit and look back towards the village, and beyond towards Yarnton and Oxford to the south-east, and over a gate towards the wide Oxfordshire landscape to the south-west - then imagine these views obscured by fences and solar panels. This track is regularly walked by many villagers, frequently taking visitors with them, often meeting other walkers along the way up or back down, on any day of the week and weekends. The walk, with its wide views of fields under crops (sometimes dotted with hares running or pheasant or partridge, while the calls of smaller birds resound everywhere) is vital to the physical and mental health of so many inhabitants of Cassington and beyond, and restorative to their wellbeing. I submit that the value of this track into the countryside, so close to the village, is far more than subjective, and should be protected from being obliterated by the erection of a solar farm on all sides, if at all possible.	Please refer to the Applicant's response to REP1-120.	Landscape and Visual Impacts
REP1-137	Councillor Dan Levy	Cassington currently suffers from periodic flooding when there is heavy rain. This is caused by run off from the fields which lie to the north and west of the village and which are higher than the village. Flooding is particularly experienced in Elms Road in Cassington. The fields in question are owned by Blenheim. The estate has been requested to improve flood resilience for many years, and has failed to do so. The fields are earmarked for covering in solar panels. There is evidence, which Cassington Parish Council intend to provide to the enquiry, that solar panels make flooding worse, by concentrating run-off to the edges of the panels, which in turn reduces the absorption of water in the ground. There is a fear that flooding in the village will get worse in the event that the project is approved. There are also floods associated with the River Evenlode, which periodically affect the A40 in the area between Eynsham and Cassington. The most recent set of floods left the A40 passable only at very low speeds and caused gridlock in the whole area. Runoff into the Evenlode will be	The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. We have since been supplied with further recent technical studies in regards to solar farms, which have been reviewed and assessed as part of our responses at DL2. The literature provided assumes that the ground conditions would stay the same, and all runoff would drip off the lowest leading edge. This is not the case for Botley West as detailed within Appendix 10.2 Conceptual Drainage Strategy **[APP-167].** Gaps between individual solar cells within the PV modules act to reduce this concentration of water flow towards the drip line and provide an alternate route for rainwater to reach the ground. Whilst solar PV modules can result in a minor increased concentration of rainwater in these locations, landscaping is proposed to reduce, slow and distribute the surface water runoff. Using wildflower seed mixes for planting beneath the solar PV modules will promote infiltration into the underlying soils and the interception of rainwater, mimicking baseline natural land drainage conditions. During more extreme events, some water will run-off through the vegetation; however, this is in the same response as the	Hydrology and Flood risk

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		increased by the solar farm and by other developments in the area, including Salt Cross (see below)	greenfield (baseline) conditions. As most of the existing land is arable/grazed farmland, the change in landscaping itself is expected to reduce run-off rates. The Applicant has demonstrated adherence to relevant parts of the NPPF and NPS and has shown that there is no significant increase in flood risk at or off-site as a result of the Proposed Development. Whilst we note existing flood risk issues off-site at Cassington, Botley West Solar Farm is not required by policy to improve off-site flood risk and instead should be assessed against the baseline conditions to ensure there is no detrimental increase. Nonetheless, further investigation has been done based on the study conducted by Atkins on the Cassington food risk. Cassington and the local area have a pre-existing history of flooding. Flows are directed by topography, which slopes south towards Cassington. Surface water modelling has been undertaken for the catchment area upstream and including Cassington. The results of which are detailed in Appendix 10.5: Surface Water Modelling Report **[APP-172]**. Potential natural flood management options have been considered as part of this study and a wide range of options can be incorporated upstream of the village to reduce the flow and provide attenuation of flood water. The proposed mitigation measures will be tested at detailed design stage.	
REP1-137	Councillor Dan Levy	Cumulative effects of Botley West: The developer asserts that each effect of the scheme, for instance on the amenities for residents, is less than substantial. However the scheme is so large that, even were that to be true, the cumulative effect adds up to substantial harm. Thus for instance, each affected footpath may be individually affected to an acceptable level, but when there are no unaffected footpaths left, the overall effect is unacceptable. This is the case here. Moreover, there does not appear to have been an assessment of the total effect on views, for instance to and from Wytham Woods (an SSSI) or to and from the prominent spires of Cassington Church and Church Hanborough.	The Applicant welcomes any evidence to support alternative views on cumulative effects that have been assessed for the Project, but its position remains that such effects have been appropriately assessed within the ES, including on matters such as footpath impacts. The assessment of cumulative effects is contained in ES Chapter 20 – Cumulative Effects and Inter-relationships **[APP-057]**. This chapter outlines how the cumulative assessment has been undertaken, including details of consultation on the approach to the assessment of cumulative schemes with statutory and non-statutory consultees. Through the cumulative assessment completed, an assessment of local infrastructure capacity has been undertaken. The Landscape and Visual Impact Assessment (LVIA) **[APP-045]** at Section 8.11. The landscape within which the Project, is located in a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. Views from the permissive paths of Wytham Woods are included within the LVIA **[APP-045]** assessment at Section 8.9 (Assessment of Effects). It should be noted that permits are available to access the woods, from Oxford University, but one of the rules is that people remain on the paths. The Applicant's assessment of likely impacts and effects on the heritage significance of the churches at Cassington and Church Hanborough, including impacts arising from changes in longer views towards these churches, is set out in the Revision 1 version of ES Appendix 7.5: Settings Assessment submitted at Deadline 2.	Cumulative Impacts
REP1-137	Councillor Dan Levy	Interaction with other developments: The maps provided by the Developer failed to show areas set aside for new housing. Salt Cross is a garden village set to the north of Eynsham, covering the area bounded by Cuckoo Lane, the A40 and Lower Road, going as far north as the outskirts of Freeland and Church Hanborough. It is a substantial development, which will add approximately 3000 residents to the parish of Eynsham. Eynsham's population is currently approx. 6000. Salt Cross is included in the West Oxfordshire Local Plan, and an Area Action Plan for the area was approved by the Planning Inspectorate in 2023. A subsequent judicial review means that part of the AAP, relating to net zero obligations, will be re-examined later in 2025. Following the final AAP, we can expect an outline planning application. The landowners of the area, which include the County Council, have no option but to proceed with a development, under the terms of an agreement which handed control of the development of the site to Grosvenor Estates. There is no mechanism for this agreement to be ended other than with the successful completion of the new village. There is much more information, including maps, on the WODC website, at https://www.westoxon.gov.uk/planning-and-building/planning-policy/salt-crossgarden-village/ Even though there is not an extant planning consent for Salt Cross, it is almost inconceivable that it will not be built, and therefore ought to have been taken into account in this application relating to the Solar Farm. The omission of Salt Cross	The Salt Cross scheme has been fully part of the Project checklist of cumulative development Tier 1 proposals (as it was submitted in outline in 2020, but has remained undetermined due to a court challenge). In any case Salt Cross has been assessed cumulatively by our technical authors, including in terms of landscape and visual amenity, drainage, traffic and transport effects. Salt Cross is mapped in the Applicant's Cumulative Assessment mapping **[APP-116]**, which WODC also reviewed and provided input to several times, and which the Applicant further updated in August 2024, before submission. Lead officers at WODC and OCC were fully involved in guiding our understanding of Tier 3, 2 and 1 schemes, including the likely timing of the delivery of Salt Cross and the obligation, set by the Inspector at the AAP, for a new active travel path from Salt Cross to the Hanborough Station was also incumbent on the developers (Grosvenor) to be delivered.	Planning Policy

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		from the application from PVDP is a substantial failure. It has not assessed the visual impact of the solar farm from a large number of houses. Salt Cross will be located to the west of Lower Road, on rising ground, overlooking the Evenlode valley and the proposed solar panels to the east of it. It has not assessed the effect on drainage, and in particular to the effect on water levels in the Evenlode in the event of heavy rainfall. Unless the omissions are rectified, I would argue that the application is so deficient that it should not be sent to the Secretary of State.		
REP1-141	Dermot Magee	Scale & Proximity: I understand this will be one of the largest solar farms in the world if approved and it would seem very strange that it is to be located in close proximity to Oxford City and Blenheim Palace given the status of both around the world. It is therefore very strange that no alternative sites have been proposed by PVDP even though they would be very conscious of the negative impact on the communities affected which will be significant and span generations of people who live and work in the areas affected.	The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. Large-scale solar installations represent one of the most effective ways to generate clean electricity while using relatively little land. Such projects are typically located in rural areas, where suitable land is more widely available and conditions like solar irradiance and grid access are more easily met.	Project Description and Design Parameters
REP1-141	Dermot Magee	Construction & Maintenance Impact: Anyone who has lived through a construction project within their neighbourhood will be very well acquainted with the constant noise from machinery, frequent heavy goods vehicles travelling through their neighbourhood that seems to go on for an eternity. The disruption to their peace and enjoyment, dust and disputes etc usually manifests itself in frustration as driveways, streets and areas in close proximity to the site become clogged with traffic and unsightly debris from the movement of equipment. Often they continue after the construction has been completed. Many residents will be frustrated by the box ticking approach of their local planning departments who either ignore the objections made by residents or justify the approval of development by stating it is necessary and will only be temporary and will revert to normal when the project is concluded. Nothing could be further from the truth and if Botley West Solar Farm is approved the experience of having to put up with any local neighbourhood project will pale into insignificance compared to the disruption that will occur to all the neighbourhoods affected by the sea of solar panels in their area. If Botley West Solar Farm is allowed to proceed in its current scale I believe we will be faced with a timetable between 2- 3 years of noise, disruption etc., assuming it remains in the ownership of the present applicant.	**Noise** A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES **[PDB-010]**, with additional information provided in ES Volume 2 (Figures) **[APP-103, APP-104, APP-105]**, and ES Volume 3 (Appendices) **[APP-212 + APP-213]**. This assessment has identified that the Proposed Development will not cause any significant adverse effects on noise sensitive receptors and effects have been assessed as short-term in duration. This assessment includes consideration of noise from construction vehicles. During the construction and decommissioning phases, noise and vibration will be controlled and limited by the Outline Code of Construction Practice (CoCP) **[APP-232 + APP-233]**. This code of practice will ensure that no resident experiences a significant adverse effect. The CoCP includes construction phase noise limits, and construction times. The Applicant welcomes further engagement with local residents. The CoCP provides that a Community Liaison Officer will be responsible for implementing a Communication Plan that engages with local residents and businesses, who will have the opportunity to make complaints on any aspects of the construction process. **Construction Process** Construction of the Proposed Development is anticipated to be up to 24 months in duration. The Outline CoCP **[APP-232 + APP-233]** states the CoCP is to set out a written set of standards and measures that will be implemented during the construction process to ensure a consistent and effective approach to managing potential environmental impacts in order to minimise nuisances to communities and to safeguard the environment. The measures include strategies, control measures and monitoring procedures for managing the potential environmental impacts and limiting disturbance from construction activities as far as reasonably practicable. **Traffic Disruption** ES Chapter 12 Traffic and Transport **[APP-049]** assesses impacts on the Strategic Road Network and the Local Road Network from the construction phase and found no significant effects. As detailed in the ES Chapter Document the outline CoCP Annex A Outline Construction Traffic Management Plan **[APP-233]** 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. 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	Construction period and methods

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			1, Chapter 6: Project Description of the ES), it would be prepared separately but remain strictly in accordance with this OCTMP.	
REP1-141	Dermot Magee	Protection of Wildlife: We are very fortunate to live in a rural environment that is home to a huge amount of wildlife, in addition to garden birds, we have migrating Canada Geese feeding in the neighbouring field, Muntjac, Bats, and Invertebrates, such as Butterflies. Why is the examination by the Inspectorate not including Ecology within the assessment and examining how the applicant intends to protect the habitats of wildlife when constructing a large swathe of solar panels which may cause irreparable damage to their habitats. I understand the Wildlife and Countryside Act 1981 protects a wide range of species and am concerned this is being left off the list and overlooked. I would respectfully request the Inspectorate include this on the list of items to be examined.	Ecological impacts of the Project have been comprehensively assessed, as set out within Chapter 9 of the ES **[APP-046]**. Although not included as a Principal Issue, the Applicant will continue to engage with Interested Parties and the ExA with respect to concerns relating to impacts from the Project on ecology.	Local Ecology and Nature
REP1-141	Dermot Magee	At the end of which all the locations affected will have changed immeasurably and the current views and lifestyle will change forever and many residents will seek to move if that is possible, thereby destroying the fabric of the villages affected.	The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors within the 5 km study area, including the available views from public rights of way, have been assessed within the submitted Landscape and Visual Impact Assessment **[APP-045]**. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured. Due to the undulating nature of the topography in the local area it would not be possible to entirely screen the Project. However, there would be no location on the public right of way network where the whole Project would be visible. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape. Additionally, new permissive footpath and cycle path routes would be created. As shown on the Illustrative Masterplan **[APP-062]** and the Landscape, Ecology and Amenities Plan **[APP-228]**. For example, between Bladon and Campsfield.	Landscape and Visual Impacts
REP1-141	Dermot Magee	In my own environment the intention is to locate solar panels in the field running parallel to our house and garden, with a gap of only 4 metres from the east facing wall of our house to the boundary of the field (2.60 on PVDP maps). This field of panels will cover an area of approx.7 acres and effectively destroy my present outlook, regardless of any screening proposed by PVDP. Furthermore, an even larger field of approx. 11 acres which runs easterly and parallel to field 2.60 on PVDP's map with a higher elevation than my home and will also be in full view. Should the applicant be given additional compulsory powers to allow cabling etc across my land iit will be a further concern. This potential threat in the affected areas will also be a concern that many homeowners will be faced with if the project is approved. Promises made verbally by PVDP that solar panels would not be sited close to residential housing have no certainty and can be changed or broken at will depending on the moral fibre of the party making the promises. Screening to limit the visual impact is without much merit as they will take up to 10 years to develop, any planting is likely to be deciduous and therefore expose homeowners to the panels for at least 6-7 months every year. I believe the Inspectorate should investigate exactly the level of privacy and protection that will be afforded to residential properties in close proximity.	Please refer to the Applicant's response to REP1-097 in respect of buffer zones to residential properties.	Landscape and Visual Impacts
REP1-141	Dermot Magee	The claim by PVDP and Blenheim that they are motivated to contribute to a cleaner energy environment source beggars belief and is disingenuous. Both expect to generate wealth for their respective stakeholders and local impacts are simply an irritation to be overcome by whatever means	The Applicant notes the IP's comments and concerns. In the UK the energy market is largely reliant upon the private sector to take risk and invest in energy generating development. The Applicant is prepared to take this risk despite the outcome not being guaranteed. The Project will only be granted development consent if the Secretary of State is satisfied that the benefits outweigh the harm and the Applicant	Needs Case

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			will only benefit commercially in this scenario. Please also refer to the response to **[REP-143]** regarding the established need case for the Project. .	
REP1-142	Dermot Magee	Increased Flood Risk In Worton: Worton has a history of surface water flooding that is documented in records held by West Oxfordshire District Council and Cassington Parish Council and also included in The Neighbourhood Plan adopted by WODC. Surface water flooding has occurred in 2008/9, 2014/15, 2021 and last year 2024 due to heavy rainfall cascading from Spring Hill to the Cassington Yarnton road. Drainage is poor due to the presence of Oxford Clay resulting in ditches becoming overwhelmed and flooding gardens in the area (see photograph of effect on my property last year). Ditches are not maintained by the owner of the field that borders my property and we are obliged to undertake the work at our own expense to protect our property. Groundwater sits at between 1.1m -1.3m during spring/summer but reduces to 0.9M in the autumn and winter period. West Oxfordshire District Council last year approved the construction of a large basement in a neighbouring property and ignored the professional advice submitted and the objections of all the neighbours who are worried it will add to increased flood risk. These concerns of increased flooding are heightened by the potential risk of additional flooding created by rainwater cascading off panels and pooling in channels to the ditches. In my view the Inspectorate should look at this area where a flooding history exists and exclude it to remove the risk to residential properties or at least insist that the applicant undertakes independent hydrology tests in such areas where flooding history exists to prove the extent of the risk and the corrective action that would be taken before the panels are installed.	We note the existing flood risk off-site at Worton Farms Ltd, we have reviewed the report produced by LDE (a RSK Company), and this is included as part of the DL2 submission, as **EN010147/APP/12.2**: Appendix 3: Flood Risk Technical Note - Worton Park v1. Similarly, we note that there is an existing flood risk to surrounding areas. There will be regular inspection and maintenance of the drainage systems, proposed Sustainable Drainage Systems (SuDS), drainage outfalls and watercourse crossings. This will be carried out by a detailed maintenance plan developed at the detailed design stage before construction. This is secured as a requirement of the DCO. The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. We have since been supplied with further recent technical studies in regards to solar farms, which have been reviewed and assessed as part of our responses at DL2. The literature provided assumes that the ground conditions would stay the same, and all runoff would drip off the lowest leading edge. This is not the case for Botley West as detailed within Appendix 10.2 Conceptual Drainage Strategy **[APP-167].** Gaps between individual solar cells within the PV modules act to reduce this concentration of water flow towards the drip line and provide an alternate route for rainwater to reach the ground. Whilst solar PV modules can result in a minor increased concentration of rainwater in these locations, landscaping is proposed to reduce, slow and distribute the surface water runoff. Using wildflower seed mixes for planting beneath the solar PV modules will promote infiltration into the underlying soils and the interception of rainwater, mimicking baseline natural land drainage conditions. During more extreme events, some water will run off through the vegetation; however, this is in the same response as the greenfield (baseline) conditions. As most of the existing land is arable/grazed farmland, the change in landscaping itself is expected to reduce run-off rates.	Hydrology and Flood risk
REP1-141	Dermot Magee	It appears to me that PVDP's motive to enter into a partnership with Blenheim is the prize of a large agricultural estate which will generate greater cash returns for them whether held under lease or sold on to another operator. It is perhaps less astonishing that Blenheim Palace/Estates are eager to accept their proposal and lease their large estates to PVDP given the significant stream of cash that will come to them over the projected 40 years of the project's lifetime. Clearly, the risk to the reputations of The Palace and Unesco is also not a big concern and one can only conclude that they are dismissive of the potential loss of perfectly good agricultural land and the cancellation of the leases to tenant farmers. However I'm sure they have a fallback position if the land becomes unusable for agricultural purposes, given they can switch to house building which they currently operate on a modest scale but will be able to scale up in the future if this proves to be necessary. In my opinion there is a real need for alternative sites to become part of the examination and in addition a more in depth assessment of whether PVDP is a responsible partner given their lack of honesty and clarity to the communities affected. I believe both these issues should be examined and clarified by the Inspectorate before granting consent to develop this solar farm.	The Applicant notes the IP's comments and concerns. The Applicant makes no comment to the IP's assertions/claims in respect of finances except to say that funds will benefit the Blenheim Palace WHS - see Mr Dominic Hare's representations on behalf of Blenheim Palace **[REP1-098]**. Alternatives have been and may continue to be the subject of the Examination and the Applicant welcomes further opportunities to articulate its site selection process. To date Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered **[APP-042]**. The NPS policy on 'Alternatives', is set out in NPS EN-1, para 4.3.15 – it follows the EIA regulations i.e. information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. **[APP-042]**. Do nothing Site location and scale; Site layout and design; Choice of solar array; Cable corridor route and laying method These sections answer in detail the way in which the site was selected and how the Applicant has dealt with cable routing (see Figures 5.1 to 5.5 **[APP-119 to APP-123]**. The overall approach is found at paras 5.1.1 to 5.2.10 and then at 5.3.1 to 5.3.3 of **[APP-042]**. References to the policy context for the consideration of alternatives and how the site was selected, and the factors that influenced this, can be found at paras 5.2.3 to 5.2.10 and again at paras 5.6.1 to 5.6.17.	Site Selection and Cable Route Alternatives
REP1-142	Dustin Sean Dryden	On behalf of Mr Dryden we remain particularly concerned that he has not been approached by the Applicants regarding any negations or discussions relating to his land ownership and rights; this was raised in the public hearing on 14.05.2025 at OFH2 Part 1 at 01:06:3201 01.07:08:29	As outlined at OFH2 and as detailed in the OFH1 and OFH2 Written Summary of Oral Submissions **[REP1-018]**, the Applicant has engaged with Mr Dryden from both a	Legal

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		- the Land Tracker Negotiations make no mention of any contact. Surprisingly the legal representative for the Applicants said at OFH2 Part 2 01:21:27:08 - 01:21:53:18 said that project founder Peter Gerstmann had met Mr Dryden twice. Those meetings took place in 2022 and pre-dated any public activity regarding the proposed BWSF. Despite personally requesting the Applicant's lawyer to correct the information he gave to the ExA - or to update the Land Negotiations Tracker, nothing has yet been done. We remain concerned that this very important procedural information & action has not been complied with or accurately represented. In view of the unique location and size of Mr Dryden's property - - we urge the ExA to direct the Applicants to comply with the obligations upon them and - importantly - to ensure they provide accurate information to the Secretary of State via this EP. We draw attention to sheets 8 and 10 of the Land Plan; is the single large area in the centre marked in grey and wholly surrounded by plots: 8-32, 8-27, 8-30, 8-38, 10-06, 10-07,10-08, 10-09, 10-10. There is possibly no other property so profoundly affected by the proposal; to assist a small selection of photographs are added here to give an insight into the present surroundings. We are concerned to understand the Applicant's behaviour in a) failing to make or record any attempts at negotiations with Mr Dryden and b) misleading the ExA by claiming that such negotiations have taken place; they have not	consultation and land perspective. Please see the post-hearing submission on this matter at paragraph 1.4.16.	
REP1-144	Geoffrey Peter Goddard	Aircraft taking off from the airport will immediately pass over the fields adjacent to Begbroke where a vast array of solar panels will be installed all carefully aligned to bounce the take-off noise into the village. Studies have shown this will treble the take-off noise projected into the village! Previuosly we were accustomed to the noise of 73000 light training and small business jet aircraft movements per annum but Cherwell Council allowed the airport to change from light aircraft to 50 passenger airliners which have already produced a vast increase in the take-off noise permeating the village. Adding solar panels directly under this low level flight path is therefor totally unacceptable and a panel exclusion zone should be added to the scheme to reduce the noise in Begbroke. Note no "experts" appear to have even considered this!	Sound from overflying aircraft would only be reflected onto adjacent dwellings when there is perfect alignment between the aircraft, panel, and dwelling, as would be the case if the solar panels were a mirror. Subsequently, any sound which could be reflected would only occur for a very short period of time (e.g. <1 second). Furthermore, in the event of perfect alignment between the three elements, sound from aircraft has the potential to double. This worst-case doubling of sound would lead to a 3dB increase in sound. It is generally regarded that a 3dB increase is only just perceptible. However, in practice, sound will not be perfectly reflected between the aircraft, panel and house, and so any increase in sound would be less in practice. Therefore, it is possible that some sound from aircraft would be reflected from overflying aircraft onto adjacent residential dwellings. However, any increase would be only just perceptible, and would occur for a very short period of time.	Noise and Vibration Impact
REP1-147	Harry St John	Funding and company structure • PVDP, who represent Solar Five Ltd, state on their website that they work closely with landowners throughout the design process and planning period to accommodate the landowners land use strategy. They claim to fund projects promotion from internal sources and have the financial means to invest in new projects without external funding. • I find this a surprising statement given the very considerable sums involved here, where outside investors will be sure to be involved in its actual development, if approved. • It would appear that the Applicant Solar Five Ltd is one of a dozen off the shelf £100 private companies with similar names (eg Solar One Ltd and so on) all owned jointly by Herr Peter Gerstmann (a resident of Shiplake, Henley on Thames, and a businessman based in Berlin) and Madame Yulia Lezhen - apparently a resident of Cyprus, but of unknown nationality. • It is self evident that neither of them have much if any interest in how this part of Oxfordshire might be affected by their private company's proposal - a massive energy infrastructure project run for private profit but potentially to be granted unlimited CPO powers by the DCO - if approved under the provisions of the 2008 Planning Act. • However I can see no compelling reasons put forward by the applicant as to why this small private company should be given such powers, rightly exercisable only where the public benefits outweigh the private loss. Here there are more private benefits than public ones. (See the MHCLG guidance on the Compulsory Purchase process issued in October 2024 and updated in January 2025). • Indeed, it is entirely possible that the two company owners could just decide to sell the consent, if granted by the S of S, to a third party about whom nothing is known, and take their profit that way. • The finances of the company are unknown as the relevant figures in the financial statements on the PINS website have been redacted - so there there is no way of telling if they really have the funds to pay the estimated £69 million they state will be needed to compensate landowners and a further c £900+ million to construct the solar power station.	The corporate structure has been duly disclosed by the Applicant and been made transparent in the Funding Statement. The beneficial ownership for companies is publicly available in the "People with Significant Control" register. It can be found under https://find-and-update.company-information.service.gov.uk/company/12602740/filing-history. The ownership structure of the Applicant is transparently disclosed as follows: 50% of the shares are held by Lockend Services Limited (a UK entity, company number 12194884), which is fully owned by Peter Gerstmann, a UK resident and German citizen. 50% of the shares are held by Yulia Lezhen, a Cyprus resident and citizen Further financing will be made available to the Applicant from shareholders, Cransseta and/or other UK based funders as they appear due. Subsequent stages of the project will be funded by those sources as well. Construction financing will be procured on a non-recourse financing basis from banks and specialised infrastructure funds. The application is supported by an outline Operational Management Plan **[APP-234]** and an outline Decommissioning Plan **[APP-236]**. Land care will be handled by a local partner, in co-operation with the landowners. Funds required for decommissioning are ensured by the operating cash flow from ordinary business activities. For this a decommissioning reserve is provided for in the business model. Additional obligation for the decommissioning arise from the land lease agreement the Applicant has entered into. Furthermore, solar panels, electrical equipment after 40 years still hold economic value and can be sold, providing additional cash flow for Decommissioning.	Funding and PPA

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		• What financial guarantees are in place that the operator will have the funds in c.40 years time to remove the panels and decommission the whole facility, as promised now? Companies can easily be wound up/liquidated leaving no assets available to complete the decommissioning and land restoration. • So there is no substantive evidence of how this proposal will actually be funded, by whom and no current guarantee that compensation funds have been deposited anywhere to give affected parties confidence that they will be paid for what might be taken from them by compulsion - as would be the case of a public body exercising CPO powers that the DCO could grant if approved by the S of S. • Moreover if the scheme were approved, consent will come with conditions and legal agreements on the long term management of the site - if it is not clear who - over the next forty years - will be in charge /responsible, then what confidence or guarantee has anyone got of that person/organisation delivering what is promised during that time. • Such questions do not arise if a Government body or a Local Authority are driving the scheme.		
REP1-147	Harry St John	Soil damage during construction • Much of the topsoil in the many panel enclosures will be damaged by heavy machinery moving around often in wet conditions drilling holes, erecting panels and fencing and laying cables within the site. Have the applicants made provision for restoring the topsoil before sowing the enclosures to grass or wild flower mixes? If not why not? • The various construction compounds - c. 8 hectares (20 acres) in total - involve the topsoil being stripped and stored for restoration later. • There are going to be c. 25 km of cables laid - it is not clear how much of that will be in roads or roadside verges as opposed to farmable land - we should be told, as if laid in farmable land the top and subsoil will be permanently damaged by laying cables or pipes. If the mechanical damage was say 3 metres wide across along say 12km that means getting on for 3.6hectares/10 acres of land would have damaged soil. • In dry conditions during construction the problem of dust needs to be catered for with water bowsers suppressing dust blowing over residential property nearby. • Likes where site accesses onto public highways is made, wheel washing facilities will be required. • I therefore ask that suitable enforceable conditions are imposed on the applicant and their contractors to ensure local roads are kept free of mud or dust, no topsoil is removed off site and soils fully restored.	The oCoCP **[APP-232]** documents the measures to be adopted for managing potential environmental impacts during construction. This includes provision of wash facilities. An Outline Soil Management Plan is provided in Annex C and Outline Dust Management Plan as Annex E. The detailed CoCP, when developed as a requirement of the DCO, will include a full Soil Management Plan and full Dust Management Plan.	Ground Conditions
REP1-147	Harry St John	Community benefit • The amount of community impact benefit on offer is frankly paltry given the sums involved and the potential returns to operator/landowners alike. • The Secretary of State should surely insist on a much higher figure than the initial offer of £50K pa since increased to £200 K pa. • The applicant needs reminding that the planning fee to PINS was less than £10K whereas two much smaller solar farm proposals (c 100 to 150 acres in West Oxon both had to pay in excess of £100,000 in planning fees). So the Applicant is getting off very lightly here, despite generating a huge amount of extra work for many organisations and local Councils affected. • The Applicants state they are considering providing subsidised electricity to local communities but give no figures, details of how such a discount would be applied and to whom or any time frame. I assume the Inspectors can require them to define in more detail this aspect of any community benefit they decide to concede and a legally binding agreement to do so.	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, £441,000 annual contribution.	Community Benefits and Impacts
REP1-147	Harry St John	There appears to be confusion over who will deliver the connecting substation which needs a separate planning consent as yet not even applied for - throwing the timing and delivery dates (especially in the context of the Connection Licence) into serious doubt. So far NGET have failed to appear at the Examination and without their input/evidence I cannot see how the Inspectors can advise the Secretary of State with any confidence.	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.	Grid Connection
REP1-147	Harry St John	Grid Connection offer • The company says it has a Grid connection offer from the National Grid Electricity Transmission (NGET) valid until October 2027. The project, if approved, would	Details of the Bilateral Connection Agreement between NGET and SolarFive Ltd can be found in the Grid Connection Statement **[APP-019]**	Grid Connection

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		take at least two years to build assuming funding can be put in place first to pay for the construction costs in the interim. That sounds a very tight programme given the Examination last until November 2025 and so a decision possibly reached by spring next year at the earliest, and the long supply chains for materials, shortage of skilled labour etc. • They say they have applied to NGET to extend this offer for another year but do not say if that has been forthcoming as yet. • The Application fails to say for sure where the vital 400 KV substation near Farmoor will be actually built (on a c. 4 hectare site comprising buildings up to c.12 m high - nearly 40 feet - by 87m x 30m. • The Applicants agent Mark Owen Loyd has told me that the NGET - not Solar Five Ltd- will be applying for a wholly separate planning approval for the new 400KV substation from the Vale of White Horse later this year. The Planning Officer from VoWH said last week they haven't even been approached in a pre App consultation as yet. • So the key connection link to the National Grid /400KV pylon line coming west out of Botley to Gloucester, is in fact not part of this proposal, and subject to a different/separate planning process. • There must be some doubt whether this substation facility can be approved, the land acquired and the infrastructure built in time for October 2027 or even by October 2028, if no application has even been made yet by NG, knowing how slowly these things can progress. • It might be deemed premature to grant the DCO approval unless the S of S was sure there was a consent in place for this new NGET sub station and that NGET were owners of the site.	The Applicant has been working closely with NGET for two years and is confident that the substation will be constructed in time for Botley West and three other connection customers to connect at Farmoor. 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.	
REP1-147	Harry St John	Time frame • It is hard to grasp the concept of 40 years being a temporary use. That is almost two generations. Temporary consents are normally applicable for residential caravans or mobile homes not over 2000 acres of solar panels on over 3000 acres of land - about 25% of the whole Blenheim Estate. • By 2070, dependence on fossil fuels will be minute, and thus the country will be even more dependent on renewable energy – why on earth, after investing approaching £1billion would one abandon the power station? • The panels themselves will need replacing in about 25 years, as will 105km of 2 metre high fencing, the wooden posts having probably rotted away at the base. So the overall investment will be still higher let alone the considerable construction activity that will be needed - not adequately addressed in the project programme as one might expect and the Inspectors have already pointed out.	It is a well-established point of planning policy that 40 years constitutes temporary use. The Applicant's comments on this, the approach to decommissioning, repair and maintenance and are also identified in the Applicant's Response to Relevant Representations **[REP1-020]** at Section 11.	Decommissioning
REP1-147	Harry St John	Scale • Firstly, the sheer scale of the whole solar panel array proposed; the panels and related infrastructure will cover c 2200 acres of farmland with a further 1000 acres given over to landscape buffers and grazing or community horticulture. • There are a number of smaller scale solar farms in this part of Oxfordshire/England which are largely out of sight and not that close to many dwellings or settlements. Most people are quite happy with these sort of schemes and each one adds to the overall supply of renewable energy without dominating an historic landscape of such quality - as this proposal would.	The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. Large-scale solar installations represent one of the most effective ways to generate clean electricity while using relatively little land. Such projects are typically located in rural areas, where suitable land is more widely available and conditions like solar irradiance and grid access are more easily met. Developing the Project at its proposed size and with its substantial benefits is an important contribution to meeting the urgent need for renewable energy identified in the National Policy Statements. The Project design is the result of an iterative design process which delivers the Project's functionality, the generation of a large amount of renewable electricity, whilst addressing the local context and setting within which it is located. See section 5.5 of **Chapter 5: Alternatives Considered [APP-042].**	Project Description and Design Parameters
REP1-147	Harry St John	• If this proved to be the case, would the applicants accept reducing the size of the proposed site needed to generate the same amount of electricity? Or will they just generate a lot more energy than currently planned on the same size of site without sharing the added financial return/benefit? Perhaps they could be asked that question by the Inspectors. • If I understand the reasoning, a connection into the 400KV NG pylon line is the vital element for a solar farm or frankly power station on this huge scale, so as to maximise the return on the investment through scaling up.	The project is currently limited to an export capacity of 840 MW under the National Grid Electricity Transmission (NGET) connection agreement (see Section 1.3.1, **[APP-234]**). This applies regardless of any future improvements in solar panel efficiency. Any additional generation would primarily offset natural performance degradation over time, helping maintain the planned generation level.	Project Description and Design Parameters

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			The Applicant has demonstrated a willingness to implement scheme refinements and reductions where practicable. This is supported by the Change Request 2 Notification submitted alongside this Deadline 2 submission.	
REP1-147	Harry St John	• I understand that a significantly more efficient solar panel material is soon to come to the commercial market (a panel combining silicon and perovskite) - I have read that tests indicate it might be at least 30% to 50% more efficient converting sunlight to electricity compared to conversion rates achieved by current technology	The Botley West Solar Farm is designed with a flexible framework that accommodates the most up-to-date commercially available photovoltaic (PV) technologies at the time of procurement. While perovskite photovoltaic (PV) technology holds significant promise due to its high efficiency potential, low manufacturing costs, and flexibility, it is not yet a viable alternative for large-scale solar farms such as Botley West. Perovskite PV technology was not selected for the project due to ongoing challenges with long-term stability and sensitivity to environmental factors such as moisture and UV radiation. Additionally, concerns about the potential release of toxic lead compounds in case of damage or improper disposal weighed against its use at this stage of technological maturity.	Principles of Solar Development and Amount of Electricity Generated
REP1-147	Harry St John	• Other similar sized projects across the world are mainly located in deserts where the ground is flat and the sunlight (irradiance) is very strong and consistent in largely cloudless skies - unlike conditions prevailing in the UK and Oxfordshire	The area of Oxfordshire identified for the Botley West Solar Farm benefits from moderate to favourable levels of solar irradiation in comparison to much of the UK, making it a viable and efficient location for solar PV generation. The region's landscape characterised by broad stretches of flat or gently sloping farmland further contributes to its suitability for hosting a large-scale solar energy project. Importantly, solar photovoltaic panels do not rely exclusively on direct sunlight to function. While clear skies may result in higher energy yields, the system will continue to generate meaningful levels of low-carbon electricity even under overcast conditions. The installation is also designed to operate effectively during the shorter and less sunny winter months, ensuring year-round contribution to the electricity grid despite seasonal variations in daylight. There is also increasingly strong precedent for consent being granted for NSIP-scale solar projects in the UK, including the East Yorkshire Solar Farm, Heckington Fen Solar Farm, West Burton Solar Project, Cottam Solar Project, Gate Burton Energy Park, Mallard Pass Solar Farm and others. The first solar DCO to be consented – Cleve Hill Solar Farm – has already started construction.	Principles of Solar Development and Amount of Electricity Generated
REP1-147	Harry St John	Damage to local wildlife, habitats etc • Others more expert than I will highlight the obvious risk to iconic local birds such as barn owls, sparrowhawks, red kites and other low flying birds like the swans prevalent in the Evenlode valley fields in winter months who could collide into this type of 2m high fencing of which there will be 105 km or 65 miles - we are being told by the applicants experts the impact will be negligible - which I find an extraordinary conclusion. • Much is made of the application's provision for skylarks - but as is well known sky larks prefer wide-open spaces where no predator can catch them unawares. The panels would make a perfect spot for a sparrow hawk to launch an attack on some unsuspecting skylark. In my experience sky larks would not come near a solar farm of this size or extent (I understand this has been confirmed by research on other solar farms) and the two year construction period of disruption in each field would have driven off the ones there now anyway. • Removing 3000 acres of largely arable land from growing grain will reduce the quantity of seed available from crops and arable weeds to feed farmland birds which are present in the area - this group of birds are already in serious decline, so reducing the local food supply further is ill-advised at best; the 1000 acres not covered in panels might be of some benefit to these birds depending on what is grown on it and how it is managed. • The Applicant seems unlikely to be involved in the long term management so is unable to provide any measure of assurance on this sort of detail. Specialist conditions should be imposed on the applicant/operator/landowners by the S of S. • The whole area has a significant population of deer - roe, fallow and muntjac who wander about freely at present for the most part. If this much new fencing is erected, they will be unable to follow existing routes of travel and be channelled by fence lines what provision is made to add an increase in RTAs involving deer on local roads? Can the Applicant be asked for more information on this and how they will prevent this increased risk? Grazing and mowing grass	Collision risk for birds in an agricultural setting as a result of the deer fencing proposed that will surround the panel installation areas of the Project site has not been documented as a significant risk to bird populations. It is used extensively throughout the solar industry with no reported instances of such collisions occurring in numbers that might threaten a population. 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 total construction period for the Project as a whole is two years; the length of time each individual field would be subject to disturbance during construction is substantially shorter. Recent research published by Copping *et al*. (2025) highlighted the benefit for farmland birds in decline of solar farms managed for biodiversity, as is intended for the Botley West Project, compared to an intensive arable baseline. This work supports the findings of a range of other studies (e.g. Montag *et al*. 2016; Jarcuska *et al*. 2024) that have highlighted the benefit for ecology of well-designed and managed solar sites through the provision of habitat heterogeneity compared to an arable baseline. As such, it is anticipated that the Project will have no adverse effect on farmland birds. As set out in section 15 of the oLEMP **[APP-235]**, the management of the Project will be delivered by a suitably-qualified landscape contractor on behalf of the Project. The Applicant is required to manage the Project in accordance with the oLEMP and subsequent detailed LEMPs as set out in Requirement 6 of the dDCO **[REP1-004]**. As such, the Applicant will have involvement and overall control of the management of the Project for the duration of the Project's operational life.	Local Ecology and Nature

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		• The panels will mostly face south and thus will prevent the sun shining on much of the ground immediately below panel tables. The proposal states sheep will be used to graze the grass in each panel field enclosure and surplus land not panelled (apart from any parcels used for community food farming). • I question how much grass of any quality or feed value will grow under the panels - because of the lack of direct sunlight so essential for photosynthesis etc to take place in healthy grass. Furthermore, any shepherd will be unable to see quickly where his flock is, because they will be hidden by panels, framework etc. Sheep are notoriously prone to one problem or another, so being able spot a poorly animal is a vital part of shepherding. • Shepherds use quad bikes to inspect stock, which could only run up and down the gaps between panel tables which will damage the grass there, impacting grazing quality further. I would defy any one trying to gather sheep in a panelled area as any sheep dog would be faced with a maze of panel table legs etc. • The bottom edge of each panel is stated to be c 0.8metre. However the height of a typical cross bred sheep is about 0.9 metre so they will struggle to get under that part of each panel, although lambs could be small enough. Obviously they could all access from the higher side assuming there are no struts as seen on some solar structures eg at Blenheim's own 20 acre solar array and the one at Kencot.. • In short I believe the practical problems will put off most sensible farmers or shepherds. This could mean the grass will need mowing or trimming through the Sumer months - causing greater risk to ground nesting birds and small mammals, reptiles etc., making it a less suitable BNG area. • Hedges • The applicants propose planting 26.5 kilometres of new hedging and gapping up another 22km of existing hedges. That sounds admirable, but when fully grown to obscure the offending panels etc in the landscape, the new hedges will blot out many existing and important long views we all enjoy at present - especially across the Evenlode Valley and the many paths and roads in the Central section. • If and when eventually decommissioned the panels etc would disappear, but the hedges would have to remain because of the Hedges Act, which precludes removal of that much hedging. • This means a permanent change to the rural landscape affected not a temporary one as claimed. • If the scheme is approved, may I request a condition be imposed that ensures plenty of berry bearing hedgerow plants are used creating the new hedges and then not cut until the spring to help feed birds over winter /spring when other foods supplies are exhausted - the hungry gap. • The new hedges will of course shade adjacent grassland to some extent and further reduce its productivity.	Although deer will be prevented from entering the fields where the solar panels will be installed through the provision of deer fencing, they will still be free to roam along buffers around the Project site, linking areas of the retained archaeology areas to be managed as grassland. As such, the Project will maintain connectivity across the site and it is not therefore anticipated that the Project will increase the risk of RTAs due to deer presence. The Applicant acknowledges that the grassland under the panels will be in poor condition due to shading and, as such, has included it as such in ES Appendix 9.13 Biodiversity Net Gain Assessment **[APP-162]**, through the use of poor condition grassland for that which would under the panels. The use of sheep to manage solar farms is well established and, as such, it is not anticipated that there will be any of the issues described with the control of sheep within the Project site. The grazing strategy for the Project will be set out within the relevant LEMPs. This will include the location of the various grazing infrastructure that will be necessary such as watering and corralling locations. As set out in the oLEMP, it is anticipated that there may be the need for an additional cut of grasslands within the Project in the early autumn; this timing has been chosen to ensure that it would avoid any interactions with ground nesting birds. The location of the new hedgerow planting has been chosen to specifically ensure that important views are maintained post development. Although it is intended that the land that forms the Project will be returned to its pre-development use, none of the hedgerows and other habitat creation that form part of the Project will be specifically removed during decommissioning. An indicative planting schedule is set out in Appendix B of the oLEMP – this includes berry-bearing plants such as hawthorn, blackthorn and dog rose. The timing of management to hedgerows has specifically been set to January (Appendix C of the oLEMP Typical Maintenance schedule) to ensure that birds and other wildlife are able to consume berries during winter but also to avoid nesting birds in early spring.	
REP1-147	Harry St John	Adequacy of Public Consultation - I wish to report that many of the photo montage illustrations (about 30 out of 50 or so) were either hard to find or simply not available at the exhibition I went to at Eynsham village hall; in particular the ones looking east, north east and south east from the higher ground south of Church Hanborough over the Evenlode valley - these in my opinion are the "Money shots" that would have revealed the true and immensely damaging impact these proposals will have on this rural landscape; the applicants team either deliberately or negligently omitted having these either on display or available as they should have been. • I told Mr Owen Loyd at the time and in later emails that it made the whole exhibition/consultation a travesty and that his company and client should be utterly ashamed - he did not agree! But the recent court case involving Lambet Borough Council and the failure to consult in accordance with the Gunning Principles as pointed out by Stop Botley West and WODC response to the consultation should be a warning to all concerned. • In researching Solar Five. Ltd and Herr Gerstmann, I found on line an interview he gave to a renewable energy magazine/website in which he said and I quote -" I would not do a project like	The Applicant has continued to prepare further visualisations to support the ES, which are presented as photomontages, for winter and summer, at agreed representative viewpoints, for Years 1 and 15. These are provided in Figures 8.248 to 8.371 **[PDB-006]** The Landscape and Visual Impact Assessment (LVIA) and photomontages have been produced in accordance with current best practice guidance. Including the Guidelines for Landscape and Visual Impact Assessment (Third Edition) (GLVIA3) and LI TGN 06/19 Visual Representation of Development Proposals. The 55 Representative Viewpoints, assessed within the LVIA **[APP-045]**, were consulted on and agreed with all host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources **[APP-045]**). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages **[APP-072 to 080]**. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance **[APP-149]**. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with	Consultation Process

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		this (ie Botley West) in Germany - because it is not possible. It would drag on for twenty years and have lots of objections. The DCO process allows the Secretary of State to determine what is in the interest of the nation as a whole - energy independence or the view from the window!	limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA **[APP-045]**. Where possible, Representative Viewpoint locations were selected based on published important views, such as those identified in the Cumnor Parish Neighbourhood Plan Important Views Report (February 2021). As stated above, all viewpoints were agreed with the local planning authorities. Photomontages were undertaken from those representative viewpoints where visual receptors have the potential to experience significant effects	
REP1-147	Harry St John	• The more secure locations will be lit at night and other parts will have sensor activated lighting- how do the applicants propose to manage the movement of animals at night, which is likely to set off the sensors and thus lighting up the normally dark parts of this rural area with floodlighting? This could be really annoying to humans living nearby and disruptive to bat and other nocturnal animals habitat.	The Applicant is not proposing to manage the movements of wild animals within the Project site. The impacts of noise and lighting are assessed for all ecological receptors in ES Volume 1, Chapter 9, Section 9.9 **[PDB-008]**, outlining no significant impacts are likely to ecology receptors. Furthermore, the security lighting will be designed to ensure inward distribution of light and avoiding light spill onto existing boundary features **[APP-234]**.	Local Ecology and Nature
REP1-147	Harry St John	Landscape Impact and the wider setting of the Blenheim World Heritage Site (WHS) • I fully support the recommendations set out in the letter responding to this proposal from ICOMOS of February and July 2024 in responding to the applicant's second consultation - this organisation advises on World Heritage sites and their designation/status - and in particular to the specific recommendations made by one of the UK's most respected Historic Landscape experts, Mr Hal Moggeridge, whom ICOMOS consulted/involved on this matter. (See page 354 onwards in document APP - 034 in the PINS library; this document runs to 945 pages of S47 responses from various bodies). • Mr Moggeridge is very robust on what he sees as the likely damaging impact on this Internationally important historic landscape that forms a further wider protective buffer/setting around Blenheim Palace and Park's WH designated boundary; much of this buffer is also part of the Oxford Green Belt. • He recommends the removal of a significant number of fields currently included in the scheme, should the proposal be approved in part. The Applicants have barely changed their initial scheme thus ignoring Mr Moggeridge's advice and patently superior expertise. • He has over 60 years in Landscape architecture, creating not destroying landscapes compared to the applicant's expert claiming just 15 years experience - I suspect largely designing schemes to offset damage of projects like this. I know whose opinion I would give greater weight to, especially as the Applicant's expert seems to have unaware of or just plain ignored a key document prepared and signed in 2017 on the management of the WHS at Blenheim, which has a very helpful Appendix on the wider setting of the landscape protecting the core WHS boundary. • I am sure others will produce this report at the Examination as it explains why the WODC Local Plan has no buffer zone round the WHS as there were and are adequate other protective designations e.g. the Cotswold AONB and the Green Belt and the dominant ownership by Blenheim - and perceived to be a landowner with a strong sense of community responsibility for this historic Estate. • There have been some excellent birds eye drone photos of views of the estate, the Palace and Park. It would be helpful if the applicant or Blenheim Estate could provide pictures that might have been or could be taken from close to the top of the tall monument (Victory Column) north of the Palace - this column is listed Grade II* and it would be interesting to verify whether any of the fields to be covered in panels can be seen from the top of the Column. If they have none, perhaps the applicant could be asked to provide some 360 degree shots from this highest point in the WHS.	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'. 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*'. 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]**. Paragraphs 1.9.55 to 1.9.59 of this document set out an assessment of likely impacts and effects in respect of the Column of Victory at Blenheim Park. This monument is listed at Grade II not Grade II* as asserted by Mr St John. Paragraph 1.9.57 states '*Although it is not possible to see beyond the enclosed Blenheim Park from land adjacent to the column, the uppermost few metres of the column along with the statue are visible in long views towards the park from land to the north east and east. However, in all such views the column and statue are not prominent and appear within the treeline on the horizon*'. The opposite must also therefore be true – some land within the Project Site would be visible in views from the top of the monument. However, there is no access to the top of the monument and therefore these views can only be experienced by users of drones fitted with suitable cameras.	World Heritage
REP1-147	Harry St John	It is clear that there is a substantial amount of Grade 3A and Grade 2 land within the site. There is a good plan showing this. But where are the areas calculated? This should be provided so it is clear to all what percentage should not be used under the basic Planning Policy tenet of avoiding BMV land for development whenever possible especially when alternative locations exist?	The areas of the ALC grades within the areas surveyed are provided in Volume 1, Chapter 17: Agricultural Land Use and Public Rights of Way (APP-054) Table 17.17. The effects on agricultural land area assessed in Chapter 17 and the economic effects of the Project are assessed in Chapter 15 – Socio economics (APP- 052)	Agricultural Land Use

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		• BMV land general has slopes no more than 11% and soil depths of over 30 cm. It is the most versatile and productive land. • Permitting the loss of such productive farm land when we are so dependent on imported food already is a very unwise strategic mistake for our country to make, as many others have pointed out but the Applicant has ignored. • Might I remind the Inspectors that nationally BMV land comprises only about 40 % of the total farmable area remaining in England and only 70% of the land in England is farmable. So BMV land is a long term strategic and irreplaceable asset for feeding the nation, despite the applicant dismissing this and claiming there is spare arable land elsewhere!		
REP1-147	Harry St John	• Noise generation during construction and then operation • Obviously there will be noise generated during construction and if approved can I ask for a condition to avoid reversing bleepers on machines on site - use only voice warnings which don't disturb whole neighbourhoods. • There are going to be 156 inverters each emitting 92dBA, 6 small substations emitting either side of 80dBA and the main substation likely to emit c.93dBA. The applicants conclude that the impact on the area will be slight. My view is that the cumulative background noise will be audible as an annoying background hum across a large expanse of the local area, depending on wind and other weather conditions. One assumes the hum might be loudest on sunny days when the greatest power is being generated but that is when people are more likely to be out in their gardens, walking on footpaths and generally enjoying the countryside. • I am told by a WODC planning officer that he was surprised by the amount noise an inverter makes when he visited the community solar farm at Shrivenham, hence my concern about 156 of them in this vicinity.	**Response to Point 1 -** A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference **[APP-050]**, with additional information provided in ES Volume 2 (Figures) **[APP-104 & 105]**, and ES Volume 3 (Appendices) **[APP-211 to 213]**. This assessment has identified that the development will not cause any significant adverse effects on noise and vibration sensitive receptors. This assessment includes consideration of noise from construction vehicles. **Response to Point 1&2 -** During the construction and decommissioning phases, noise and vibration will be controlled and limited by the Outline Code of Construction Practice **[EN010147/APP/7.6.1]** (CoCP). This will ensure that no resident experiences a significant adverse effect. The CoCP includes construction phase noise limits, and construction times. The noise and vibration impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES **[APP-050]**, with additional information provided in ES Volume 2 (Figures) **[APP-104 & 105]**, and ES Volume 3 (Appendices) **[APP-211 to 213]**. **Response to Point 3 -** The assessment shows that sound from the development will not be a significant source of sound at any property. This assessment is based upon the PCS units operating close to capacity, which will only occur for a small proportion of the year. During the majority of the time the sound from these PCS units will be less than is shown in the assessment. The assessment has been undertaken using the computer noise modelling software SoundPLAN version 9.1. This software includes the topography of the site, including reflections from the ground and structures.	Noise and Vibration Impact
REP1-147	Harry St John	Security Fencing and public rights of way • The whole scheme involves the erection of security galvanised steel netting fencing c 2m high over 105 kilometres or c 65 miles. This is to keep out humans and deer, and keep in sheep. Other animals should be able to get through the netting fence with the exception of fully grown badgers - maybe special passes can be provided for them.. • Where a public right of way passes through the scheme in most cases both sides will have such 2M fencing - in my opinion degrading the very experience of walking through the countryside . • It will look like a prison camp or detention centre - albeit without razor wire but many security cameras. • In places, rights of way will end up in "tunnel like corridors" with high hedges either side and consequential virtual loss of the long rural views over the mosaic of woods, hedges and fields that exist now. • Who would want to walk along such a path then? In my view the proposal is immensely damaging to the enjoyment of these public rights of way • The fence posts will consume a great deal of timber i.e. more trees being felled, or iron - both of which will need concrete footings with consequent soil damage in the erection and decommissioning process along 105 kilometres. • After 25 years, the fencing will need replacing if the posts are timber (as illustrated in photo montages). Whether the wire netting will last 40 years depends on local conditions. • Are these elements properly reflected in the Carbon footprint calculations provided by the applicants experts and if so where?	The statement that the whole scheme involves the erection of security galvanised steel netting fencing is a little misleading. The project will use agricultural-style deer fencing, 1.8 to 2.1 metres high, to secure key infrastructure including solar PV modules, PCS, substations, and electrical compounds (Chapter 6: Project Description, section 6.4.38 **[APP-043]**). The fencing is described as visually permeable and commonly used in rural settings to help minimise visual obstruction. Please refer to the Applicant's response to REP1-141 for response regarding public rights of way.	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-147	Harry St John	Whilst I can understand the Government's desire to accelerate the delivery of solar power generation, this part of England is not as sunny as the southern coastal belt of England or east Anglia. The applicants do not seem to have looked hard at any sites in those areas. • Nor have they made any obvious effort to see if there might a similar amount of land available adjacent to the same 400KV pylon line between Oxford and Gloucester. • Looking at the route of this pylon line, there appear to be large tracts of mainly arable land of average quality but in a more sparsely populated area with fewer constraints e.g. World Heritage, Green Belt designations, listed buildings etc. • In my opinion there is insufficient evidence to demonstrate that the applicants have made more than a cursory attempt to look elsewhere for a suitable site.	The NPS policy on site selection, is not overtly prescriptive, there is no absolute criterion that has to be followed when site finding. Fundamentally, the Applicant has been led by: Factors that are noted as influencing site selection are set out in NPS EN-3, para 2.10.18, plus guidance relating to the assessment and minimising adverse effects – the applicants assessment section of EN-3 ES Volume 1, Chapter 5: describes the Alternatives Considered **[APP-042]**. The NPS policy on 'Alternatives', is set out in NPS EN-1, para 4.3.15 – it follows the EIA regulations i.e. *information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility*. The Applicant is not required to report on every possible 'alternative' (e.g. in other areas of the Country) only those it has studied. A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. **[APP-042]**. 1. Do nothing 2. Site location and scale; 3. Site layout and design; 4. Choice of solar array; 5. Cable corridor route and laying method These sections answer in detail the way in which the site was selected and how the Applicant has dealt with cable routing (see Figures 5.1 to 5.5 **[APP-119 to APP-123]**. The overall approach is found at paras 5.1.1 to 5.2.10 and then at 5.3.1 to 5.3.3 of **[APP-042]**. References to the policy context for the consideration of alternatives and how the site was selected, and the factors that influenced this, can be found at paras 5.2.3 to 5.2.10 and again at paras 5.6.1 to 5.6.17. Paras 5.6.1 to 5.6.17 highlight the interplay between factors that the applicant considered. There was no single or determinative factor that influenced the final site chosen or its size; it was a combination of many factors, considered together. Connection capacity at a substation had to be suitable and available or could be made available, but at the same time so was the availability and suitability of land nearby to accommodate a solar farm at scale. Planning and environmental constraints also played a key role in site selection and the scale of the development. See also Applicants Supplementary Statement of Need (PDB–014) which addresses additional reasons for the siting and scale of the solar farm. The project responds to the existence of capacity in the network in this location, not on the south coast or in East Anglia, and to the demand for renewable energy to support the existing and growing Oxfordshire and Thames Valley sub-region. <u>Better Sites?</u> The Applicant notes that the SofS should not refuse an application on one site simply because fewer adverse effects would result from developing similar structure on another suitable site – all suitable sites may be needed – NPS EN-1 para 4.3.24. Similarly, alternatives that are not commercially viable or physically suitable (para 4.3.27), or proposals that are vague or immature, (para 4.3.28) can be excluded from consideration. Also whilst NPS EN-3, para 2.3.9 states that the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects of National Significance (for example, by giving priority to the reuse of previously developed land), (Appendix 2 Table 2 NPS EN-3 Compliance Table, page 59, para ref 2.3.9), the Applicant did, in its search for suitable sites, consider the use of previously developed or brownfield land, but none were considered more favourable than the subject site.	Alternatives and Roofs
REP1-147	Harry St John	The Green Belt • The Inspectors will be aware that the Government proposes to change Green Belt policy and introduce a Grey Belt designation where parts of the Green Belt, deemed partially degraded or developed, could be released for further development.	Grey Belt is a device introduced into planning policy to allow planning authorities to prioritise where development might be directed. As the development is temporary and reversible, the Applicant does not expect Botley West to be classified as Grey Belt by any planning authority. If granted, there will be a binding obligation upon the developer to remove it in accordance with a Decommissioning Plan **[APP-236]**, to be approved by the planning authority.	Green Belt

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		• It would therefore massively increase the risk of long term development on parts of the proposed solar farm that presently lie in the Green Belt, should the landowners decide such land could be more profitably used for housing etc. • I believe that is a serious risk that further justifies refusing this project along with its many other flaws.		
REP1-147	Harry St John	In the library paper APP - 021 relating to compulsory acquisition para 1.4.6 refers to the CA Guidance of 2013 - there is also a new general CA guidance issued first in October 2024 and updated further January 2025 - should not the key extracts from that revised guidance be added in to the PINS Library of relevant documents?	The Applicant has referred to relevant Compulsory Acquisition guidance in its application.	Planning Policy
REP1-148	Harry St John	Can the Applicant explain what condition they believe the soil under the panels will be like after c 40 years in the shade, reduced levels of nutrients and lack of direct rainfall, given Sheep grazing being impractical on a sensible scale on the area under panels involved.	The management of the site would be undertaken in accordance with the principles in the outline Landscape and Ecology Management Plan (APP-235) and secured through Requirement 6. Grasslands can be successfully established, as is the case within numerous current solar installations and Section 17.9.23 – 17.9.26 of Chapter 17: Agricultural Land Use and PRoW (APP-054) outlines the types of soil benefits that can develop during the operational period of the solar farm, where the current intensity of arable cultivation is replaced with a more extensive agricultural grazing use.	Agricultural Land Use
REP1-148	Harry St John	How will the community food growing arrangements work- like allotments? Will Blenheim be responsible for letting that sort of user? Rent free?	The Applicant has signed memoranda of understanding with two community food groups and is in discussions with a number of others that participate in the Oxford Farm to Fork scheme. There is flexibility as to approach and method, crop and size. No rent will be charged and a licence to occupy issued.	Community Benefits and Impacts
REP1-155	Michael Brown	Glint and Glare are a risk to pilots and birds, and also a worry to those of us living opposite a hillside covered in panels	The Glint and Glare Assessment considers effects toward aviation receptors (including pilots) and residential dwellings.	Glint and Glare
REP1-155	Michael Brown	Hydrology and Flood Risk:The flood risk to parts of Cassington in particular has been referred to in a number of responses to the main consultation and in Relevant Representations. The Applicant has so far offered only limited proposals to alleviate this. Based on recent experiences the risk of increased flooding caused by run-off from solar panels would be so great that that much more than a few 'ponds' will be required. Whatever further steps are taken to reduce the increased risk, these would only work if they were well maintained at least during the whole of the operational period	The Outline Landscape and Ecology Management Plan **[APP-235]** and 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. The Applicant has demonstrated adherence to relevant parts of the NPPF and NPS and that there is no significant increase in flood risk at or off-site as a result of the Proposed Development **[APP-047]**. Whilst we note existing flood risk issues off-site at Cassington, Botley West Solar Farm is not required by policy to improve off-site flood risk and instead should be assessed against the baseline conditions to ensure there is no detrimental increase. Nonetheless, further investigation has been done based on the study conducted by Atkins on the Cassington food risk. Cassington and the local area have a pre-existing history of flooding. Flows are directed by topography, which slopes south towards Cassington. Surface water modelling has been undertaken for the catchment area upstream and including Cassington. The results of which are detailed in Appendix 10.5: Surface Water Modelling Report **[APP-172]**. Potential natural flood management options have been considered as part of this study and a wide range of options can be incorporated upstream of the village to reduce the flow and provide attenuation of flood water. The proposed mitigation measures will be tested at detailed design stage.	Hydrology and Flood risk
REP1-155	Michael Brown	Ecology and nature conservation: At dusk bats regularly fly over and around our garden which borders the north west corner Plot 8-27. They and birds of many varieties will be confused by a sea of grey/blue glass. We also see deer and pheasants regularly traversing this area. Their routes between woods will be disrupted, and fencing may cause injury. Their movement may also trigger security lighting and disturb nocturnal animals.	The impacts of the project to all ecology and nature conservation receptors are assessed in ES Volume 1, Chapter 9, Section 9.9 **[PDB-008]**. This has been informed by a range of ecology surveys, presented in ES Volume 3, Appendix 9.1-9.14 **[APP-150-163]**. A summary of the impacts of the project on ecology and nature conservation receptors is presented in ES Volume 1, Chapter 9, Section 9.16 **[PDB-008]**, outlining both negative and positive impacts to ecology receptors. It is not possible for an Environmental Statement to consider effects on every potential ecological receptor, nor would that be a proportionate approach to the EIA. The assessment focusses on those receptors where there are likely significant effects. The list of receptors has been agreed with Natural England. As deer are wide-ranging in their habits and movements, it is not considered that significant changes in deer movements will be brought about by perimeter fencing. Furthermore, local deer species are not of conservation concern, as such are not considered as an ecology and nature conservation receptor. The process by which	Local Ecology and Nature

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			such receptors were selected followed good practice guidelines (CIEEM 2023) and was agreed with Natural England. The impacts of noise and lighting are assessed for all ecological receptors in ES Volume 1, Chapter 9, Section 9.9 **[PDB-008]**, outlining no significant impacts are likely to ecology receptors. Furthermore, the security lighting will be designed to ensure inward distribution of light and avoiding light spill onto existing boundary features **[APP-234]**.	
REP1-155	Michael Brown	Cultural/Historic Environment: The project would affect not only the wider setting of Blenheim Palace WHS but also a number of conservation villages, Grade 1 listed churches and many other listed buildings. Very little attempt has so far been made to properly protect their 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]**. Mitigation, including through sensitive design, avoidance and mitigation measures, is evidenced at numerous locations where the design of the Project has been adjusted to avoid or reduce impacts on heritage assets, and this process is also reflected in the changes to the Project design set out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2.	Historic Environment
REP1-155	Michael Brown	Agricultural Land: Contrary to a number of repeated assertions on behalf of the Applicant over the last two or so years in the media, and by Mr Hare, Blenheim CEO at the Open Floor hearing on 13th May about the poor quality of the land, the Applicant's own assessment shows quite the contrary. (APP-110). Indeed it shows most of the land either side of the river Evenlode to be of Grade 2 or 3a. The National Policy Statements say BMV land, which this is, should be avoided 'where possible'	The Agricultural Land Classification provides a system for classifying land according to the extent to which its physical characteristics impose long-term limitations on agricultural use. The ALC document states that "the grading does not necessarily reflect the current economic value of yield. The grade cut-offs are not specified on the basis of crop yields as these can be misleading, although in some cases crop growth may give an indication of the relative severity of a limitation.	Agricultural Land Use
REP1-155	Michael Brown	Noise and Vibration: During construction both the noise and vibration from hammering or drilling by many operatives across the sites for thousands of supporting structures for panels and fencing would be high. During the Operation period the cumulative noise from 156 converter stations has again been downplayed by the Applicant. The Applicant's calculation is designed to provide a lower noise level result in an otherwise relatively quiet environment than is likely particularly for all those either living close to, or walking along footpaths close to, a number of the stations. Again it is the cumulative noise that would be worse.	A full noise impact assessment has been undertaken in accordance with all relevant technical and planning guidance, with noise mitigation measures suggested where they are required. The assessment can be found in Chapter 13 of the main ES reference **[APP-050]**, with additional information provided in ES Volume 2 (Figures) **[APP-104 & 105]**, and ES Volume 3 (Appendices) **[APP-211 to 213]**. This assessment has identified that the development will not cause any significant adverse effects on noise and vibration sensitive receptors. During the construction phase, noise and vibration will be controlled and limited by the Outline Code of Construction Practice **[APP-232]** (CoCP). This will ensure that no resident experiences a significant adverse effect. The Outline CoCP includes construction phase noise and construction time limits, and the implementation of Best Available Technique (BAT) throughout the entire construction phase. Noise from the operational phase will be controlled and limited by the Outline Operational Management Plan **[APP-234]** (OMP). This includes noise mitigation measures which will ensure that no resident experiences a significant adverse effect. Mitigation measures include noise limits for operational noise sources, as well as the location of operational phase noise sources to reduce the potential noise impact on receptors.	Noise and Vibration Impact
REP1-155	Michael Brown	Traffic and Transport: The surrounding road network is already congested most days throughout the year. There are long queues along the A40 between Oxford and Eynsham. Lower Road is not even a B road but takes constant fast traffic. Getting onto it from Church Road has become more and more difficult during the years we have lived here. Construction traffic for panels, fencing and for one of the sub-stations to and from the A40 Eynsham roundabout up to the construction compounds adjacent to Lower Road will make the congestion that much worse. During the Operational Phase there would be maintenance, repairs and replacement teams and equipment still using these roads. Experience suggests that any limitations imposed would soon be forgotten by or be unknown to many solar farm delivery drivers and construction and maintenance staff	An assessment of the impact of construction traffic upon traffic and transport receptors along Lower Road is set out in section 12.10 of ES 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). It concludes that the construction traffic would not create any significant effects upon traffic and transport receptors along Lower Road. 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. Table 12.7 of ES Chapter 12 **[APP-049]** sets out that maintenance activities would generate a light vehicle daily / weekly and that the potential impact of additional vehicle movements on the Local Road Network (which includes Lower Road) and other transport receptors during operation and maintenance of the Project is unlikely to result in significant effects. The Outline Construction Traffic Management Plan (OCTMP) forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and sets out the HGV access routes at Appendix A1. Paragraph 1.3.7 of the OCTMP **[APP-232]** sets out that the Principal Contractor and any sub-contractor(s) will be required to comply with the	Traffic Transport and Access

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			agreed routeing plans and will ensure that all drivers are informed of the need to restrict HGV movements to those specified routes. Section 1.11 of the OCTMP **[APP-232]** sets out how the measures contained therein will be monitored and enforced, including the access routes. The OCTMP **[APP-232]** and its measures, monitoring and enforcement contained therein, including the HGV access routes and the requirement for the Principal Contractor and any sub-contractor(s) to adhere to those routes, is secured at Schedule 13 of the Development Consent Order **[APP-015]**.	
REP1-155	Michael Brown	- lack of photomontages, I believe that the Applicant has failed to provide anything approaching an adequate photographic montaged representation of the serious cumulative adverse visual impact on the landscape affecting residents and visitors using the PRoW. - Absence of photomontage for viewpoint 24 - Landscape and Visual Impact: I do not believe that assertions of 'not significant' in the Summary of Significant Effects (APP-058) are credible. Much is made of the maturity of planting by the summer of year 15 year. None of photographs or montages show any winter projections beyond year 1. Even if all the planting matures it would not provide the same degree of screening after the leaves have fallen off each Autumn. And in any event there would still be numerous views of panels and fencing in the summer along the PRoW even if the planting matures successfully. Worse, after decommissioning to the extent that the many miles new planting have flourished and remain, the views that everyone has enjoyed to up to now would be diminished permanently	The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources **[APP-045]**). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages **[APP-072 to 080]**. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance **[APP-149]**. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA **[APP-045]**.	**Landscape and Visual Impacts**
REP1-155	Michael Brown	Green Belt: Although not available at any of the consultations, the Planning Supporting Statement at APP-225 includes the Applicant's submission in relation to its case for very special circumstances. However it presents a weak case for industrialising great swathes of Green Belt. The case does not get stronger because of multi-repetition.	The Applicant notes the IP's observation. The case for development is set out in full, including the need, in the Applicants Planning Supporting Statement and Supplementary Statement of Need **[REP1-012 and PDB-014]**.	Green Belt
REP1-156	Michael Field	Decommissioning Solar PVs After nuclear power, utility-scale solar poses the worst end-of-life disposal challenge. PVDP's strategy for decommissioning Botley West will be found in the Decommissioning Plan (DP), the Decommissioning Traffic Management Plan (DTMP) and the Decommissioning Waste Management Plan (DWMP). These do not exist at present. They will be written prior to decommissioning, but their likely content is considered in the Outline Decommissioning Plan. Paragraph 1.2.3 outlines what might be expected in the DP, which is 'secured' in the DCO. The DTMP is similarly secured [1.2.1]. PVDP aims to dispose of PV panels by employing best practice and sending panels to an authorised re-processor in accordance with Best Available Treatment, Recovery and Recycling Techniques. It will use the 'proximity principle' to avoid long-distance transportation. This is probably not acceptable for the purpose of a DCO. There is no authorised re-processor for utility-scale solar, and there is no prospect of one in the foreseeable future. Panels are sent to landfill because the technology does not exist to recycle on anything approaching a commercially viable basis. Sadly, virgin glass is just too cheap (as well as having the superior purity required for, say, solar panel manufacture). The Inspectorate would not look favourably on a nuclear power proposal that overcame the contaminated waste issue by predicting a scientific breakthrough in nuclear half-life prior to decommissioning. Solar PV proposals should attract the same scrutiny. We all pray for a miracle breakthrough in reprocessing methodology, but a DCO application must work with what there is, not what we keenly wish there was. Botley West is ultimately a landfill project. Two million panels at 30kg each is 60,000 tons, and if all panels are replaced at least once by year 26, that's at least 120,000 tons in PV waste alone. This is more than enough to qualify or a new landfill site, particularly as current UK sites are struggling to meet demand. Where will the panels end up? As PVDP is guided by the 'proximity principal,' does it anticipate a Bladon LPA application by year 25, or should a Blenheim Estate Landfill Project be included as associated development in the DCO ? Has consideration been given to the construction of an on-site chemical processing facility to remove the toxic elements (cadmium, lead, mercury) prior to burial? <u>Decommissioning Logistics</u>	Details of the Applicant's response on decommissioning, recycling, funding and the methods for securing these measures are details in the Applicant's Response to Relevant Representations [**REP1-020]** at Section 11.	Decommissioning

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		There will need to be decommissioning compounds to accommodate all the HGVs, plant, office space, solar panels, etc, both at end-of-life and at the replacement stage (by year 26). Where will these compounds be located? Lanpro has overlooked this requirement. Following construction, each compound will (somehow) have been replaced with a grass field and PV panels (ca. 2800). You can send bulldozers into a grass field, but not into a field of panels, tables and piles. Assuming the decommissioning compounds will be located at the original sites, where will all the plant and piles of PV be based while the compounds are being restored? There is no set-aside open space in the vicinity. It's all PV. For obvious reasons, the logistics of this are even more challenging when year-25 replacement is attempted. At ISH1, the solicitor clarified that replacement is both happening (PV lifespan assumption) and not happening (PVDP anticipation). Decommissioning Fund There is no statement in the Outline Plan or elsewhere about how the decommissioning process will be funded – whether for recycling or landfill. It must be speculated that the operator will divert profits to a reserve account over the farm's twilight years. This would be placing an extraordinary amount of faith in a future undertaker. It is also possible – indeed, likely – that SolarFive's bank account will be depleted by end of operations, and that the company will simply file for liquidation. If dwindling profits result in premature closure, this becomes a racing certainty. In any event, the local councils (i.e. ratepayers) will presumably pick up the substantial bill. The responsible measure would be to lodge a decommissioning bond with DESNZ prior to operation, just as for a nuclear plant. If the ExA agrees, the bond should be secured in the DCO, and PVDP should propose and justify its monetary value at examination.		
REP1-156	Michael Field	According to Table 6.3 of ES Project Description the scheme will have between 1,800,000 and 2,200,000 PV panels. This is somewhat lower than the range previously anticipated in the Scoping Report (Table 6.1) at 2,500,000 to 2,800,000. As a provisional Illustrative Masterplan has now been drawn up, what is the Masterplan panel count? Zooming in on the Masterplan confirms that a 'standard' table comprises 26 PV panels in portrait configuration (13 × 2) as described in the Scoping Report. (Project Description omits the standard table.) This is consistent with the dimensions of the Longi LR5-72HGD panel (2278 × 1134mm) specified in Table 14.7 of ES Climate Change. Most of the layout uses this standard table, but the Masterplan raises some questions: 1) There are many ultra-short tables (e.g. 1 and 2 in the diagram). The Scoping Report gave a minimum table length of 14m. Project Description reduced this to 3m. Table 1 looks like a single panel width: 1m. A brief survey on Google Satellite suggests that no tables on UK farms are less than 8m. Are these ultra-short tables drawn in error, or is PVDP pushing the envelope on table design?	Table 6.3 in Chapter 6: Project Description confirms flexibility. This design flexibility allows the layout to adapt to site-specific constraints final layouts will be refined at detailed design stage to determine the exact tables width. The inclusion of ultra-short tables is intentional and supports the aim of minimising land disturbance, preserving existing landscape features, and reducing visual impact. The Masterplan serves as an illustrative tool to provide a general overview of the project layout. The largest parameters used at Scoping Stage is to ensure that the Scoping is broad enough to cover the final parameters that are then pursued as part of the DCO application.	Project Description and Design Parameters
REP1-156	Michael Field	The north-south table gap is specified in Project Description as between 1.5m and 3.0m; the gaps measured on the Masterplan are 1.5m (panel:gap ratio 3:1). This is considerably narrower than the 4.0m gap that one sees typically in the UK. At lower latitudes tight spacing might be acceptable, but up here at 52°N the sun never gets very high: tight spacing will result in excessive energy loss for much of the day due to self-shading (shadow from the adjacent row of panels to the south). Similarly, Table 6.3 of Project Description specifies a minimum distance of 7m between the fencing and the solar tables, whereas the Illustrative Masterplan shows PV panels consistently packed in with a fence	**Panel Spacing and Self-Shading** The north-south table spacing of 1.5 m to 3.0 m, as presented in Table 6.3 of Chapter 6: Project Description, defines the Rochdale Envelope within which the final design will be developed. This range accommodates flexibility for site-specific optimisation, including topography, ground conditions, and solar resource. These shadowing effects are well understood in UK solar development and are carefully considered in layout modelling. Importantly, for typical tilt angles of 12–15° the risk of significant inter-row shading remains low The final spacing between rows will be subject to refinement during the detailed design stage, based on yield simulations and shading analysis. The intention is to achieve a balance between land use efficiency and maximised energy output, in line with standard solar PV design practices in the UK. It is also worth noting that the dual landscape module configuration (two panels stacked vertically) and the maximum table height of 2.3 m are intended to improve elevation angles and reduce shading impact.	Project Description and Design Parameters

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		separation of less than 5m. Is this an interim layout subject to revision upon further critical review? 5) Longi supplies the LR5-72HGD at power ratings between 560W and 590W. This should not be confused with a car manufacturer offering a range of engine options. Longi manufactures the LR5-72HGD; variation in manufacturing tolerance results in spectrum of performance rolling off the production line. Whilst PVDP should be applauded for committing to the premium product (like all other NSIP applications), this is not a credible scenario. We cannot rely on all the other solar farm constructors settling for the budget end variants. For the purpose of planning, does it make more sense to calculate performance and CO2 emission data based on a mid-range variant, such as 575W?	**Fence-to-Table Separation** With respect to the minimum 7 m distance between fencing and solar tables specified in the Environmental Statement (ES), we confirm that this dimension is part of the design envelope for assessment purposes. The Illustrative Masterplan serves as an indicative layout only and is not intended to represent a detailed or fixed construction design. Any apparent discrepancies in fence-to-table separation reflect illustrative assumptions rather than binding specifications. The final site layout will comply with the environmental and operational parameters defined in the ES, and will be adjusted during detailed design pursuant to Requirement 5 of the draft DCO to ensure sufficient maintenance access, safety clearances, and landscape mitigation. **Solar Module Specification (Longi LR5-72HGD)** Regarding the use of the Longi LR5-72HGD module, we confirm that the stated power range of 560 W to 590 W reflects the manufacturer's standard tolerance spread, not a variety of distinct models. These modules are produced in high volumes and undergo post-manufacturing binning based on achieved performance. In this context, it is not accurate to equate the output spread to optional configurations such as those offered by automotive manufacturers. The Applicant's intention is not to assume the absolute peak output (590 W) across the full module count. Rather, performance modelling for planning and carbon assessments is typically based on a representative mid-range output value, such as 575 W, which aligns with BEIS and industry best practice. This approach offers a realistic and conservative basis for estimating annual generation and associated emissions savings, ensuring credibility in projections.	
REP1-156	Michael Field	At ISH1, the ExA enquired about the ability of the ac cabling to handle increased power following a possible year-25 upgrade of the PV panels/PCSs. Replacing the ac cables as well would obviously not be desirable. It can be misleading to think of these cables as a having a maximum rating like domestic wiring. HV cables are not subjected to anything close to a level of current that risks, for example, fire or melting insulation. Rather, there is a trade-off between cable cost and energy loss. (An electricity generator is paid for its energy not its power.) The question might have been expressed better as: 1) Based on the 33kV/275kV/400kV cable specifications, what is the cumulative loss of power in the ac cabling when the array is supplying 840 MW at the NG substation (expressed as % of PCS output power)? 2) If the panels/PCSs were upgraded (and assuming NG was able to accept the higher power), what would the loss be if 1200 MW was being supplied? The % loss in the ac cables is unlikely to increase noticeably with a PV/PCS upgrade. However, transformers are a limiting factor if power is increased. These do have maximum power ratings (strictly, apparent power rather than real power, because of the reactive component of the load). Because of their significant unit cost, it is unlikely that PVDP will have overspec'd the transformers, unless a future power upgrade is confidently anticipated. [An "840 MW" solar farm has a mean (average) power output of 95 MW, so the cables are rarely under any stress at all – and only to a limited extent for a few midday hours in late June if there is no cloud.]	1) Based on the 33kV/275kV/400kV cable system, the total cumulative losses of transmission, transformation losses, and self-consumption energy are around 9.9%. 2) The applicant is not intending to seek an increase to the agreed AC export capacity of 840 MW under the existing National Grid connection agreement.	Project Description and Design Parameters
REP1-156	Michael Field	According to Project Description [Table 6.4], there will be 14 infrared security cameras: two for each of the seven substation. The cameras will have emergency lighting [really?] There will be manual lighting and PIR motion sensor security lighting for the PV arrays and transformers [=substations?]. There will be manual lighting and PIR motion sensor security lighting for the electrical compounds [=substations?] In contrast, OOMP [2.8.3] says that the boundary of the site will have CCTV. Presumably 'CCTV' means the same infrared cameras (?) How many? A thousand? (The boundary fencing is 100 km long.) The substations will be monitored remotely [2.2.3]. Where? By whom? Why are the boundary CCTVs not also being monitored? The section concludes with a bucket of optional extras, including remote monitoring [which they already have] and a loudspeaker announcing "Police On Way" [2.8.7].	According to Table 6.4 of ES Chapter 6, two infrared security cameras are proposed at each substation, totalling 14 cameras. These are intended for localised security and may include emergency lighting, activated only during triggered events, to assist in visual confirmation in low-visibility conditions or during alarm events. There is no proposal for full site boundary CCTV coverage, and no additional surveillance infrastructure is assessed in the ES. Lighting across the site is minimal and limited to areas required for safety and security purposes only. Per Table 6.4 and Section 6.4.38: • No lighting will be permanently switched on • Lighting is limited to: Manual operation or Passive Infrared (PIR) motion-sensor-activated security/emergency lighting	Project Description and Design Parameters

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			• Lighting is only used around: Substations, PCS units and Access points, where necessary for safe operations. Substations will be monitored remotely, with the system operator conducting routine periodic visits to inspect and maintain operational infrastructure (OOMP 2.2.3). Section 2.8.7 of the OOMP lists optional measures (e.g. intruder alarms, audible alerts), but these are not committed features. The security approach is designed to balance operational needs with environmental sensitivity, and all measures fall within the assessed and permitted design envelope.	
REP1-156	Michael Field	At the heart of BWSF's security strategy lies the Risk Management Threat Assessment with its Security Risk Rating as determined by a Suitably Qualified and Experienced Person (SQEP), with security reviews at "identified times associated with the rating" [2.8.2]. SQEP registers are for professionals such as nuclear engineers and front-line air force personnel. What is the recognised 'qualification' for a Threat Assessment SQEP? Where is the register of accredited members? This security proposal is just techno-babble. If wholesale plagiarism is your design methodology, you should, at the very least, ponder the text that you are copying. Cable theft from solar farms is a UK growth industry – 750 km of dc cable in nine months of last year – with international export now outperforming scrappage as the preferred downstream logistics. The NSIP solar field is a wet dream for copper recycling entrepreneurs: far from sight, no time pressure, no dangerous voltages (at night) and an inexhaustible supply of dc cable. BWSF will be hosting 3000 tons of copper in its dc cables [GHG Calc, Table 14.1]. This market sector is certain to mushroom as NSIP solar matures. Cottam won its DCO, but the ultimate owner will pay dearly for this woefully inadequate security strategy. PVDP must do better. It should have come up with a coherent answer to the security dilemma. Adding a sentence about fixing a fence was not that answer. PVDP should have consulted the experts: SEROCU (our regional organised crime div.) and security companies that specialise in on-site protection for large-area complexes. They know what needs to be designed into a sterile perimeter, appropriate surveillance measures and a robust ongoing security protocol. Risk Management Threat Assessment is what you do before project design kicks off.	As set out in Section 2.8.2 of the OOMP, the security strategy is based on a Risk Management Threat Assessment led by a Suitably Qualified and Experienced Person (SQEP). In this context, 'SQEP' refers to security professionals with demonstrable expertise in infrastructure risk evaluation and mitigation, typically holding nationally or internationally recognised certifications (such as CPP, PSP, or equivalent). While there is no single register of SQEPs, the individuals or firms engaged will be selected based on their qualifications, relevant experience with comparable utility-scale projects, and adherence to UK security standards. This ensures that any recommended measures are both credible and proportionate to the site's operational risk profile. Concerns around cable theft and material risk are noted and security measures will be reviewed in consultation with relevant authorities where appropriate. In the meantime, the relevant management plans contain appropriate security measures. For example, the outline Code of Construction Practice **[APP-232]** sets out that "S*ites will receive a security risk management threat assessment during the construction phase. The assessment will be procured by the Applicant and will be conducted by suitable qualified and experienced persons and will determine security risks*".	Project Description and Design Parameters
REP1-156	Michael Field	An appealing feature on the Illustrative Masterplan is the inclusion of Skylark Plots, shown as brown squares, within the solar arrays. These are described in section 11.6 of Outline Landscape and Ecology, and broadly follow the guidance in the government's set-aside compensation scheme AB4: Skylark Plots. ("Unsown plot" in 11.6.3 presumably means an area not 'sown' with solar panels.) AB4 concerns the planting of winter crops, such as slow-growing wheat cultivars, which provide the ideal habitat in spring for skylark nesting sites. AB4 requires the plots to be at least 50m from the field boundary, as skylarks keep well clear of hedgerows and other land features that may expose them to predation. The Landscape language is similar to that of AB4, with the exception that PVDP calls these 'foraging areas' rather than the nesting sites intended by AB4. The 50m rule is not observed in the Masterplan drawings. ("Drilling" refers to the farming mechanism used for seed sowing.) It is difficult to accept that skylarks will be attracted to a small plot of land bordered by seven-foot-high glass/metal reflective 'hedgerows,' either for nesting or foraging. And, where will our skylarks be nesting once their current sites [ES Appendix 9.9] have been eliminated? Should the ExA consult RSPB or Natural England to confirm that this is a "widely used mitigation strategy for developments" such as solar farms [11.6.2]? The hasty application of copy–paste suggests that this may not be the author's area of expertise.	Unsown in 11.6.3 of the oLEMP refers to unsown with grass seed to ensure that the plots are bare ground initially and to therefore help support a diversity of habitats and associated diversity of the invertebrate prey that is important for birds such as skylark whose chicks feed exclusively on insects and spiders for the first week of life. The invertebrate abundance is also important for adult skylark later in the season. The plots are referred to as improved foraging areas for skylark since, although they may be used by nesting skylark, the role of skylark plots in an arable setting can also be to provide enhanced foraging habitat for skylark that are nesting in the surrounding landscape. As such, they enhance the breeding success of nests outwith a field such that they raise more chicks.	Local Ecology and Nature
REP1-156	Michael Field	If PVDP knows of a shepherd with a flock of diminutive sheep and a mobile water-dispensing business who is prepared to supply, remove, supply again and remove 5000 animals annually in the back of a Landrover to PVDP's unworkable schedule, a timely submission of support is encouraged. Sheep are not the problem. The problem is Plan B. Sheep certainly have a photo-op role to play in public relations – and possibly even a role in the opaque GHG and biodiversity calculations (?)In the real world, for large-scale solar on prime agricultural land, operators invariably invest in a fuel bowser and some grass-cutting	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>	Agricultural Land Use

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		tractors. And, for BWSF, that is a problem. The solar PV tables are so tightly packed in (1.5m north-south separation) that a tractor will not fit between adjacent table rows. Will PVDP be resorting to garden lawnmowers and strimmers? This does not appear to have been thought through adequately.	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.	
REP1-156	Michael Field	The Masterplan also shows the network of roads (R) than run around the perimeters and across the fields. These are coloured grey here but are described as 'grass with occasional matting' or 'natural ground surface' [OOMP, p6]. Are these sufficient to support the weight of emergency fire tenders year-round? Has Oxfordshire Fire and Rescue been consulted? The roads look a bit narrow for the job (2.5m), and the turn radii are certainly far too tight to be negotiated by a fire tender. Should some panels be removed to relax the radii? How will a replacement PCS be delivered to its location? These are the size of a standard trailer unit [Project Description,Table 6.3]. An articulated lorry plus crane would be unable to reach their destination on BWSF's internal roadways.	Figures 2.1a to 2.4d of the ES **[APP-062]** show the Illustrative Masterplan and all maintenance roads are shown indicatively for which measurements and precise geometries should not be taken. Given the illustrative nature, the precise make-up of the maintenance roads are not specified but will necessarily need to be of a specification to allow vehicles to travel along them which will include fire tenders. Notwithstanding, the layout shown on the Illustrative Masterplan (Figures 2.1a to 2.4d of the ES **[APP-062]**) has been prepared using swept path analyses of HGVs to ensure that sufficient space has been allowed for HGV and crane movements and PCS deliveries.	Traffic Transport and Access
REP1-157	Michael Field	Is there sufficient harmonic attenuation to prevent, among other consequences, premature transformer failure?	Detailed electrical studies, including harmonic load flow and resonance analysis, will be conducted during the final design phase (as required). These studies will ensure that harmonic levels are sufficiently mitigated and that the transformers operate within their rated thermal and dielectric limits throughout the lifetime of the project.	Project Description and Design Parameters
REP1-160	Mike Gorick	Re. the financial statements. In respect of this, there is one aspect of financing that, if presented to any competent management and board of directors, would mean that the project is turned down instantly without further consideration. This is whether or not there is a legal requirement to submit a funding statement with the actual figures in the accounts they should not be blanked out as is the case here. The accounts statement is dated y/e 2022, I would expect to see a later report. But the point is nondisclosure immediately draws attention so that the reports have no value. It is impossible to see why the application should be accepted or allowed to proceed on this basis alone.	The publicly available copy of the Funding Statement **[APP-022]**, redacts some personal and commercially sensitive details, however a non-redacted copy of this has been provided to the Examining Authority.	Legal
REP1-160	Mike Gorick	Smoke and Mirrors. This is a well known strategy which disguises the reality with complex structures. Pinpointing one aspect of this; clearly Solar 5 looks to be a small company to front the application creating a UK identity but with only two directors and one or two staff. A look at the details at Companies House company number 12602740 will reveal this together with the persons who have significant control, their shareholdings, and their links. You can draw your own conclusions. I am sure that you may have done this already because comment has been made about it in the media as well as the noted "dubious funding" comments by MP's. A similar range of questions may be desirable regarding Photovolt company number15009444.	The Funding Statement **[APP-022]** sets out the required information to establish the Applicant has the financial resource available to construct the Project.	Legal
REP1-160	Mike Gorick	Funding. Who will fund and really control the project now and in the future? e.g. if there is a change in the source of funding. Where does the funding actually come from? Is the intention to obtain consent, then market the project to speculators and therefore real control to foreign fund management companies? Has a bank agreed to indemnify funding? Is there a breach of Russian Sanctions? None of this is clear and transparent. It should not be open to speculation. But for National Infrastructure changes, control and security should surely be clear and carefully guarded in the public interest, not private individuals.	The Funding Statement **[APP-022]** sets out the required information to establish the Applicant has the financial resource available to construct the Project.	Legal
REP1-161	Miles Tuely	I disagree strongly with the statement in the PEIR that " the Solar Farm would have a minimal or low adverse impact on designated heritage assets". I also disagree with the other PEIR statement that " no residential properties have the potential to experience a degree of harm over and above substantial". I have had opinions from two national firms of estate agents confirming that there would indeed be a serious adverse impact and that the degree of harm would be more than substantial.	The assessment of the likely impacts and effects of the Project on heritage assets is presented in ES Chapter 7.5: Historic environment **[CR1-003]**. The assessment concludes that there would be no significant effects.	Historic Environment
REP1-161	Miles Tuely	The PEIR does not regard Grade 2 listed buildings as of significance but, by not including Grade 2* listings, it must be assumed that they are of significance. I contend therefore that enclosure 1.12 should be taken out of the scheme altogether because the panels would also badly affect the Oxford Drama School and Sansomes Cottage.	The methodology used for the assessment of the likely impacts and effects of the Project on heritage assets is presented in section 7.5 of ES Chapter 7.5: Historic environment **[CR1-003]**. A matrix-based approach is used within which Grade II listed buildings are ascribed a 'medium' level of sensitivity or value, and Grade II* (and Grade I) listed buildings are ascribed a 'high' level of sensitivity or value. The Oxford Drama School and Sansom's Cottages are not listed buildings, although they could be considered as non-designated heritage assets. Neither would be physically impacted by the Project; any harm to their significance would occur as a	Historic Environment

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			result of the change within their setting. The design of the Project has changed since the PEIR and can be seen on Figures 2.1b and 2.1c of ES Figures 2.1a-2.4c - Illustrative Masterplan **[AS-020]**. The areas of solar PV panels have been pulled back so that there is a significant buffer between the buildings and the panels, and new hedgerows would be established around the perimeter of the areas of panels. Any impact on the heritage significance of these non-designated heritage assets would be very limited.	
REP1-161	Miles Tuely	My third concern is the effect on the local road network, particularly the B4027, during the construction period. This is an extremely busy road much used as a shortcut between the A44 and the A4260. It is likely to be the main access point for much of the land in the northern sector and is totally inadequate for that purpose. It serves both the village of Wootton and the minor road known as Stratford Lane. Both routes should be designated out of bounds to construction traffic if the scheme goes ahead. The B4027 has already been the access route for Blenheim Estate's existing solar scheme at Weavely Farm but this is a minor project compared to the one under discussion. Nonetheless, many of the neighbours reported serious nuisance from the piledriving during the installation of the panels.	An assessment of the impact of construction traffic upon traffic and transport receptors along the B4027 is set out in section 12.10 of ES 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). It concludes that the construction traffic would not create any significant effects upon traffic and transport receptors along the B4027.	Traffic Transport and Access
REP1-161	Miles Tuely	My second concern is the effect on the local public rights of way. The popular bridle way and footpath from Wootton to Woodstock will be shrouded in fencing on both sides. This also connects with Akeman Street an ancient Roman Road. The footpath, Dornford Lane, will be similarly affected.	Please refer to the Applicant's response to REP1-120.	Landscape and Visual Impacts
REP1-162	Nigel Roderick Pearce	Written Representation (WR) - Best and Most Versatile Agricultural Land	The Applicant notes the written representation from Mr Pearce in regard to the agricultural land quality, the ALC and Soil Survey Report by Reading Agricultural Consultants **[APP-233]** and the statements made by Dominic Hare at the Open Floor Hearings in regard to the quality and productivity of the soil in general.	Acknowledgement
REP1-163	Nigel Roderick Pearce	I watched the Open Floor Hearing 1 livestream on 13 May and was astonished by what was said about BMV land and soil quality by an influential supporter of the proposal. I am therefore submitting a written representation to you now on this subject. The attached document records in detail the misleading, inaccurate, and structurally biased approach that PVDP and its consultants have taken towards this issue from the very start, which has had the effect of consistent and coordinated downplaying of the quality of the agricultural land proposed for Botley West. It is clear to me that they regard this issue as a weakness in their application. Hence their considerable efforts to minimise its importance. I was also interested to hear the discussion about assessment methodology and matrices in the Open Floor Hearing of 15 May. In the attached document, I cover matrices, as they relate to BMV land and soil, at some length. I hope that may be of some assistance in your continuing deliberation	The Agricultural Land Classification provides a system for classifying land according to the extent to which its physical characteristics impose long-term limitations on agricultural use. The ALC document states that "the grading does not necessarily reflect the current economic value of yield. The grade cut-offs are not specified on the basis of crop yields as these can be misleading, although in some cases crop growth may give an indication of the relative severity of a limitation.	Agricultural Land Use
REP1-170	Professor John Dowling	There are, as you know, many Planning reasons for this To summarise - Application to be rejected and each of them strengthens the others in an overpowering, cumulative case; these include inappropriateness of scale of the energy installation to 5 the landscape, the inadequacy of the Green Belt argument, the visual impact on so many Villages, and harm to one of the country's greatest Heritage settings which, paired with Oxford and the Cotswolds, is important for the tourist economy for English identity and future homes. A Thames cable crossing with the awfulness of ploughing thousand-year-old meadowland would be inconsolable; the terrible effect on farmland from all the wire fencing and piling with technical noise, construction disruption and much else would seem irreparable and hence permanent, I dare say.	The Applicant notes the IP's comments and concerns. However, the Applicant disagrees with the IP's assessment of harm/adverse effects. Their case is set out in its Planning Supporting Statement **[REP1-012]** and in the Applicants ES. The IP claims the Applicant is ploughing thousand-year-old meadows in the vicinity of the 'Thames Cable crossing'. The Applicant believes the IP is making an incorrect assumption – if the land referred to is the meadows south west of Swinford bridge, that option was rejected by the Applicant because of the sites' sensitivity. In any event, to avoid or minimise adverse ecological effects, the Applicant intends to use HDD in the cable corridor options for significant distances north and south of the river, as well as under the Thames itself [see APP-123 and the annotated entry and exit HDD pit locations].	Planning Policy
REP1-171	Penelope Marcus	In the Application Documents submitted by Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd, there is no Appendix specifically covering the inclusion of lighting systems that will be required for the installation and protection of the Solar Farm. All the many lighting installations will be triggered by external movement close to them, be that human, or, much more likely and frequently through the night, that of wildlife in the immediately adjacent and surrounding countryside. Because of the proposed location for Botley West Solar Farm, in countryside, this will result in instances of Dark Sky Pollution, and impact light pollution on the landscape, countryside, and environment. This will potentially aU'ect an area of 1000 hectares that is traditionally and historically free of artificial light and is meant to be dark at night. The light pollution can damage wildlife and their habitat, and affect astronomy.	The impacts of noise and lighting are assessed for all ecological receptors in ES Volume 1, Chapter 9, Section 9.9 **[PDB-008]**, outlining no significant impacts are likely to ecology receptors. Furthermore, the security lighting will be designed to ensure inward distribution of light and avoiding light spill onto existing boundary features **[APP-234]**. Details of proposed lighting are provided in ES Volume 1, Chapter 6, Section 6.4 **[APP-043]**. The impacts of noise and lighting during construction, operation and decommissioning will be mitigated by a number of best practice measures as set out under various management plans. Outline versions of these plans include the Outline Landscape and Ecology Management Plan (oLEMP) **[APP-235]**, Outline Code of Construction Practice (OCoCP) **[APP-232- 233]**, Outline Operational Management Plan (oOMP) **[APP-234]** and Outline Decommissioning Plan (oDP) **[APP-236]**. Furthermore, a sensitive lighting strategy to minimise the impacts of lighting on ecology receptors in accordance with the Institute of Lighting Professionals/ Bat Conservation	Local Ecology and Nature

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			Trust guidelines will be implemented during construction as outlined in the Outline Code of Construction Practice (oCoCP) **[APP-232-233]**.	
REP1-171	Penelope Marcus	Further, not only will such light pollution significantly impact the setting of the UNESCO World Heritage Site, which in evidence presented to the Open Hearings, stretches well beyond the walls of Blenheim Palace, but also the immediately adjacent countryside of the proposed solar farm lies in the Cotswold Area of Natural Outstanding Beauty.Areas of Outstanding Natural Beauty (AONBs) are protected from light pollution through various measures aimed at preserving their dark skies and natural landscapes. An adjacent industrial site using emergency and motion sensor activated lights for protection and security clearly fails to preserve the dark skies and natural landscape of the area.	Please refer to the Applicant's response to REP1-072 in respect of the LVIA **[APP-045]** approach to nighttime effects and lighting.	Landscape and Visual Impacts
REP1-171	Penelope Marcus	I would like to bring to the attention of the Inspectorate for the assessment of the Botley West Solar Farm application the total inadequacy of visual representation supplied by Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd, for the recognition of the impact of the solar panels by anyone being near them, or even seeing them from afar. The project proposes between 1.8 million and 2.2 million panels, each 1.1-1.4m w x 2.1-2.4m l x 0.03 x 0.04m d., dark blue, dark grey, or black in colour, and in height from 0.8m to 2.20m-2.30m above ground. (BWSF Environmental Statement, Table 6.3, Project Component) It is frankly astounding that the applicant believes that merely 31 photomontages of single views of fields covered by panels could be suU'icient for assessing the impact of so many of these solar panels located on a site of 1000 hectares, or that the impact on the site could be characterised by a few of what they apparently consider typical vistas. This is not flat desert country, but a dramatically changing landscape of rolling uplands and valleys, and the site is immediately adjacent to the Cotswold Area of Natural Outstanding Beauty. Further, that for any of the selected views, the photomontages show the view in either the winter or summer (autumn), but not both. Obviously, the views of the landscape change dramatically according to the season. However, equally astounding is that the applicant has relied on single-shot photographic images for the presentation of proposal, and not considered other forms of visual presentation. The medium of film has been available since 1888 and using it would have enabled the applicant to present walkers' or drivers' experience of the cumulative impact along a road or footpath. Instead of merely producing plans, which do not visually represent fields, there has been no attempt to use drone images, which would give a full, wide view of the targeted landscape. Similarly, there are no superimposed photomontage on drone images. The applicant has not oU'ered 3-D models for showing the impact of the solar panels in the landscape, nor conceived of presenting interactive 3-D models for the experience of being close to fields of solar panels, 1.1-1.4m w x 2.1-2.4m l x 0.03 x 0.04m d., dark blue, dark grey, or black in colour, and in height from 0.8m to 2.20m-2.30m above ground. Too much of the information and documents presented by the applicant has been the results derived from working at a computer and not examining the fields. The failure to use available technical resources to present full and accurate evidence of the impact of an industrial project does not meet the requirements of PINS Guidance 8/8/24: 'The information and documents that the applicant provides for consultation need to be clear and informative so that the project can be understood by anyone looking at it.'The impact of the Solar Farm on 1000 hectares of Oxfordshire countryside has not been suU'iciently presented for consideration by the National Inspectorate. It fails Gunning Principle 2:'there is suU'icient information to give 'intelligent consideration'	Please refer to the Applicant's response for REP-155 in respect of Representative Viewpoints and photomontages.	Landscape and Visual Impacts
REP1-172	Penelope Marcus	I would like to bring to the attention of the Inspectorate for the assessment of the Botley West Solar Farm application what appear to be further instances of misrepresentation in the photomontages, the visual representation supplied by Photovolt Development Partners (PVDP) on behalf of SolarFive Ltd, for the recognition of the impact of the solar panels by anyone being near them, or even seeing them from afar. - App - 072: Images 3, 7, 9, and 11: Panels shown as dark areas whereas would show some light reflection, lake-like; Image 5: Panels presented as low 'dinky' installations, in contradiction to actual dimensions, given above. The panels made to too low against the hedging. - App-073: Image 1: Panels do not show accurate relative height against height of a telegraph pole (8-10m high); Image 4: Exaggerated height of hedging reduces impression of height of solar panels; Images 5, 9, and 13: Areas of panels shown as dark but should show some light	The viewpoint photography is aligned using Environment Agency, National LiDAR Programme, 1 m resolution Point Cloud data. For close views, 5 cm drone Point Cloud survey data was also used. **Landscape Institute_ Technical Guidance Note- –06/019 Visual Representation of Development Proposals (LITGN 06/19)** Photomontages meet (and exceed) Visualisation Type 3 guidance which is suitable for EIA projects LI TGN 06/19 states *that "Type 3 visualisations offer an appropriate level of detail and accuracy for a range of EIA and non-EIA projects"* (paragraph 4.4.1). Below is the relevant extract from LITGN 06/19.	Landscape and Visual Impacts

reflection, lake-like.
- App- 074:
Image 6: Panels not shown at full height or likely light reflection
Images 9, 11,13: Distant panels shown as dark and not reflecting some light reflection
- App- 075
Images 3 and 5: Do not accurately indicate the height of the panels
Images 7 and 9: Distant panels shown as dark and not some light reflection, as if a lake.
Image 11: Misleading image of height next to a telegraph pole
Image 13: Query whether wild hedge would reach 5 m after 15 years, and its height given in relation to 10m+ telegraph pole
- App-076:
Image 3: Distant panels would not be seen as dark but reflective, lake-like
Image 5: Misleading image of height of panels adjacent to telegraph pole. Pole serves to reduce the appearance of the height of the panels
Image 9: Does not represent the impression of the height of the panels
Image 11: Height of hedging serves to reduce impression of height of panels
Images 14, 15, 17: Dark area of distant panels instead of lake-like reflection.
- App-077:
Image 2: Dark area instead of lake-like reflection
Image 7: Misleading image of height
Image 9: Hedging shown as massive, so diminishing height of panels
Images 12 and 14: Distant panels shown as dark instead of reflecting some light.
- App- 78:
Images 1,3,7,10, and 11: Distant panelling shown as dark, instead of reflecting some light
Image 4: Show what panels will look like against dead hedging.
- App-79:
Image 1: Juxtaposition of panels to derestriction sign serving to reduce impression of height of panels
Images 3, 7, 9: Dark panels where should be reflecting some light
Image 11: Misrepresentation of height of panels next to low hedging
- App-80:
Image 3: Dark panels not reflecting some light
Image 7: Misleading juxtaposition of height of panels against height of telegraph poles.

Table 4: Suitable photographic / print formats (Type 3):

Camera / lens	FFS + 50mm lens	Cropped frame + 28 or 35mm lens
Presented Field of View (H x V)	39.6° x 27°	Either 35mm = slightly narrower than FFS+50mm, or crop 28mm image to match FFS+50mm
Sheet size	A3	
Image size (mm)	390 x 260	
Enlargement relative to FFS / 50mm	100%	100 - 120%
Sheet size	Cylindrical Panoramic image @ A1 width	
	90° x 27° (VFoV as appropriate)	
Enlargement relative to FFS / 50mm	96%	
Image size (mm)	820 x 250 minimum (height as appropriate)	

This matches the presentation we have used for Botley West.

Camera height - we work at a comfortable height on a tripod (approx. 1.5m)

"Camera height is fixed at 1.5m in SNH / THC wind-turbine guidance and this should be adhered to where that guidance is regarded as applying. For other project types, camera height should be set comfortably for the photographer and recorded / stated as noted at Appendix 10. Additional height may be required to represent a proposed change to a viewpoint's finished level e.g. a raised Highway" (paragraph 3.1.3 of LI TGN 06.19).

The solar panels are 2.3 m at the highest point. The photomontages show hedgerows based on accurate wireline modelling. Reference blocks of 3.5 m height and 2.5 m wide were created, which were then draped on the existing terrain model along the hedgerow planting lines.

REP1-174	Rosemary Lewis	Whilst acknowledging that there was an assessment of noise impact during the operational phase on residential receptors I asked the Applicant to explain: 1. How the rather limited number of residential receptors listed in Chapter 13 Noise and Vibration **[APP-050]** was selected and 2. Why there was no similar noise assessment for these receptors during the construction phase of the project The answer given to (2) was "Noise impact assessment (APP-050) does include an assessment of construction phase noise on residential receptors that is all set out there. It's also expanded in the construction appendix 13.2 which is APP- 212 as well. It is fully considered at all residential receptors". Having re-checked I can confirm that table 13.6.2 deals with operational phase noise only. There is no equivalent to table 13.6.2 for Construction Noise in either APP-050, or APP-212. Incidentally table 13.2.6 omits many sensitive receptors. Some of the most significant are listed here but many more exist: 1. Dornford Cottage, one of the closest and most impacted properties in the Northern Site (different from all the other "Dornford" properties listed) 2. Oxford Crematorium, very close to the cable route 3. The Oxford School of Drama at Sansom's Farm 4. Grove Road, Bladon, several properties adjacent to red line boundary 5. Bladon Primary School	The receptors which have been used in the assessment (ES Chapter 13 - Noise and Vibration **[APP-050]**) have been identified as those most likely to be affected by noise and vibration from the development. The nosie and vibration assessment includes a consideration of both construction and operational phases. The construction phase assessment (Appendix 13.2 Construction Phase Noise and Vibration **[APP-212]**) considers the potential noise and vibration impact of each construction process (e.g. HDD, Construction Compound, Construction of Sub-Stations, etc). The approach for the assessment of each construction process has been undertaken using the appropriate methodology for the construction process under consideration (e.g. a qualitative assessment, or computational noise modelling). This assessment process is detailed in full in **[APP-212]** and this assessment has been broken down to consider the residential receptors listed for the operational effects. The operational phase assessment (Appendix 13.3 Operational Phase Noise **[APP-213]**) 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.	Noise and Vibration Impact

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		6. Bladon Churchyard (containing the much visited Churchill's Grave) 7. College Farm and other properties on Lower Rd 8. Lake View House, Cumnor The only assessment of potential magnitude of impact during construction is table 13.25 which assesses any receptors <1344m from solar pile driving to be of high impact. There are over 5,000 within 1km but none of these have been assessed despite this general assessment. The view expressed in para 13.9.16 is repeated in APP-212 Appendix 13.2 in paragraph 1.5.11 "the solar pile driving works would be very transient in nature and would move across each of the installation areas. Thus, receptors may be exposed to high noise levels but this would occur only for a short period of time". No evidence is provided for this statement or consideration of cumulative impact and in 1.15.3 "if required, noise screens could be installed around the solar pile driver where the installation occurs very close to residential receptors" but these residential receptors have not been identified or assessed. I have raised elsewhere the need for a full residential amenity assessment on visual, noise, traffic, Socio-evonomic, health and many other impacts. The consideration of noise impacts on residential amenity is just one of many in areas that have been inadequately addressed.	The results of each assessment differ, as the assessment methodology for each noise type differs. A number of receptors have been identified by the consultee, and these are considered each in turn below; 1. *Dornford Cottage, one of the closest and most impacted properties in the Northern Site (different from all the other "Dornford" properties listed)* **RESPONSE** – This receptor is considered to be representative of Lower Dornford Farm. The noise and vibration impact form the development at Lower Dornford Farm is not significant. 2. *Oxford Crematorium, very close to the cable route* **RESPONSE** – It is assumed that the consultee is referring to North Oxford Crematorium and Cemetery on Banbury Road. This is not a residential receptors and is therefore considered to be less sensitive to noise. In any case, it is considered to be representative of the receptor to the north (e.g. Threshers Barn). The noise and vibration impact from the development at Threshers Barn is not significant. 3. *The Oxford School of Drama at Sansom's Farm* **RESPONSE** – This receptor is considered to be representative of Samson Barn. The noise and vibration impact from the development at Samson Barn is not significant. 4. *Grove Road, Bladon, several properties adjacent to red line boundary* **RESPONSE** – These receptors are considered to be representative of Bladon Pits, The Beaches, and Brackenwood. The noise and vibration impact from the development at these receptors is not significant. 5. *Bladon Primary School* **RESPONSE** – This receptor is a school, and cannot be assessed using the methodology in BS4142. In any case Bladon School is considered to be representative of Brackenwood. The noise and vibration impact from the development at Brackenwood is not significant. 6. *Bladon Churchyard (containing the much visited Churchill's Grave)* **RESPONSE** – This receptor is a church-yard, and cannot be assessed using the methodology in BS4142. In any case Bladon Churchyard is considered to be representative of Brackenwood. The noise and vibration impact from the development at Brackenwood is not significant. 7. *College Farm and other properties on Lower Rd* **RESPONSE** – These receptors are considered to be representative of Goose Eye Farm. The noise and vibration impact from the development at Goose Eye Farm is not significant. 8. *Lake View House, Cumnor* **RESPONSE** – This receptor is considered to be representative of Hiedersbach. The noise and vibration impact from the development at Hiedersbach is not significant. Table 13.25 of 6.3 - ES Chapter 13 - Noise and Vibration **[APP-050]** identifies a worst case impact magnitude for piling activities. However, as is discussed in paragraphs 13.9.15 to 13.9.19 the impact from solar pile driving will be significantly less, in practice. The exact construction methodology has not yet been defined. However, as was discussed in the ISH1, the 'piling' for the solar panel stations is akin to a machine to install fence posts, as opposed to those used for substantial buildings.	

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			Subsequently, the solar pile driving machine is likely to be able to install a large number of stanchions per day. As a result, it is likely that residents would only experience a slightly elevated sound level for no more than a day or so. The exact location of any noise screens has not yet been identified. This detail will be included in the Construction Management Plan. We remain of the opinion that a full, and detailed assessment of the potential noise and vibration impacts of the development on noise sensitive receptors has been undertaken. The assessment in 6.3 - ES Chapter 13 - Noise and Vibration **[APP-050]** demonstrates that there are no Likely Significant Effects from noise or vibration.	
REP1-176	Russell Tucker	Size and location concerns SIZE: The Developer has failed to outline a clear rationale for the size of the proposed solar facility. They have made the following assertions: 1. That the size of facility is essential for the UK net zero strategy – yet they do not provide a coherent and unbiased argument as to why the government cannot rely on multiple smaller solar facilities, or use alternatives such as wind power. 2. That they have a contract with National Grid to supply 840MW of power – yet their agreement with National Grid is not for a minimum of 840MW, but is in fact for a maximum of 840MW. The Developer has actively misled the public over this fact. 3. That the size of the facility is essential to support Oxfordshire's net zero strategy – yet the power generated will be connected to the national grid and not ringfenced for local use, and does not take into consideration the large volume of either operational or planning approved solar facilities in the county. 4. That they will provide new public rights of way – yet residents have responded saying they will travel outside of the 11.5 mile solar facility in order to access footpaths and connect with nature, confirming that they have no desire for more footpaths between solar panels, and increasing automotive journeys by residents. LOCATION: The Developer has failed to outline a clear rationale for the location of the proposed solar facility. They have made the following assertions: 1. That the location of the proposed solar facility is the only option available – yet 75% of the proposed facility is in green belt land and on farmland that is in many areas rated as BMV. It would be irresponsible to take this land out of food production, especially as the UK imports a large amount of food already 2. That the Very Special Circumstances for building on the green belt are satisfied – yet the arguments made by the developer are weak - they state that the only other potential site was in Cowley, also on Green Belt land. 3. That the installation is temporary - yet a planned 42-year time horizon is not a fair-use of the phrase temporary. This is misleading to the community and misleading to the planning inspectorate. There is also no guarantee to ensure that any approval does not result in further development on the green belt land. 4. That the installation conforms with the latest planning guidance – yet significant portions of the site would be best used for food production as it is classed as grade 1, 2 or 3a land. Government guidance clearly sets out that this should be protected from development and that brownfield sites should be prioritised That the proposed site has no impact on heritage assets such as Blenheim Palance or Sansoms Platt – yet the UNESCO World Heritage Site Committee specifically points to the unique setting of Blenheim Palace within the wider countryside and the developer's report does not include letters of support from all Trustees of Blenheim Palace (not Blenheim Estates) or a letter of support from UNESCO, confirming that there is no impact on the World Heritage site whatsoever.	**Size Concerns:** Large-scale solar installations represent one of the most effective ways to generate clean electricity while using relatively little land. Such projects are typically located in rural areas, where suitable land is more widely available and conditions like solar irradiance and grid access are more easily met. Developing the Project at its proposed size and with its substantial benefits is an important contribution to meeting the urgent need for renewable energy identified in the National Policy Statements. Project design is the result of an iterative design process which delivers the Project's functionality, the generation of a large amount of renewable electricity, whilst addressing the local context and setting within which it is located. Section 5.5 of Chapter 5: Alternatives Considered **[APP-042]**. The Applicant notes that, whilst decentralised generation has an important role to play in decarbonisation, on its own, smaller scale solar generation, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. Therefore, smaller scale solar, including rooftop solar, must be considered as addition to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Project. Section 3.5.6 of Planning Supporting Statement inc Green Belt Case **[APP-225].** **Location Concerns:** The area of Oxfordshire identified for the Botley West Solar Farm benefits from moderate to favourable levels of solar irradiation in comparison to much of the UK, making it a viable and efficient location for solar PV generation. The region's landscape characterised by broad stretches of flat or gently sloping farmland further contributes to its suitability for hosting a large-scale solar energy project. The site selection and design have been influenced by several key factors including irradiance, site topography, network connection, proximity to dwellings, agricultural land classification, accessibility, public rights of way, and security and lighting. EN-3 recognises that for larger utility scale solar generation, network capacity and availability of a grid connection have a significant effect on the commercial feasibility of a project, and this has been a critical factor in determining in site selection. National policy direction does not dictate limits on grid connection allocations for solar, but does require the cumulative effects of multiple schemes to be assessed and managed, where grid connection availability can contribute to such effects **[NPS, EN-3 paragraph 2.8.63]**. The Environmental Statement outlines several alternatives considered during the planning process. These include the "Do Nothing" scenario, alternative site locations and scales, and different technologies and layouts for solar panels. The Applicant has evaluated various options for cable routes, ultimately deciding to lay cables underground using the highway network to minimise environmental impact. In areas where cables cross undeveloped land, techniques like HDD or pipe ramming are used to avoid impacting landscape features. See Chapter 5: Alternatives Considered **[APP-042]**.	
REP1-176	Russell Tucker	Consultation concerns: The consultations have not been adequate. Huge volumes of information have been shared that appear to be designed to make it intentionally difficult to navigate and the developer has not materially considered the views of local consultees. By their own admission, the vast majority of respondents are not supportive of their proposal, yet they have not made a concerted effort to engage the community and adapt their design to be more reasonable.	The Applicant acknowledges this comment but confirms that the level of consultation undertaken, and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in the Consultation Report **[APP-024]** and confirmed in the Acceptance checklist (s55) **[PD-001]** and Notification of Decision to Accept Application **[PD-002]**, which was submitted to the Planning Inspectorate and accepted for examination.	Consultation Process

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			The Applicant undertook its consultation in compliance with commitments made in its published Statement of Community Consultation, which in turn was informed through consultation with relevant local authorities. This is described in Section 6 (Preparation for Statutory Consultation) of the Consultation Report **[APP-024]**. The Applicant's strategy of undertaking an iterative consultation process has allowed for feedback to inform the development of the Project in a timely manner, including reporting back to consultees at an interim stage. The Applicant prepared and published a range of consultation materials available in a various formats to cater for differing preferences and levels of interest and expertise. For example, this includes: a Preliminary Environmental Information Report (PEIR); a Non-Technical Summary of the PEIR; Community Consultation Leaflet; and a Feedback Form.	
REP1-177	Ruth Atherstone	In my original submission I pointed out that the traffic through Cassington either to or from Yarnton or on the Burleigh Road has increased hugely as motorists try to avoid the congestion on the A40 and use Cassington as a way to avoid the chaos. The result is heavy traffic through the village, not adhering to the 20mph limit, and an increasing number of dangerous potholes on both Yarnton and Burleigh roads. (Part of Yarnton Road has just been resurfaced as a result). At the Thursday hearing on transport I found the developer's response to the increase of traffic from the project disingenuous. They said that there will be minimal disruption and explained their response by saying as there is already a lot of traffic, the project traffic would have little extra effect whereas if the traffic had been light, the project would have made a significant impact. This is actually playing with facts. The roads around us are already at breaking point and will be far worse when the council does roadworks to add a bus lane on the A40. It can already take us an hour to do the 4 miles into Oxford. ANY extra traffic, let alone years of heavy construction vehicles on our roads, is going to make a desperate situation even worse. It cannot be called an insignificant effect	An assessment of the impact of construction traffic upon traffic and transport receptors is set out in section 12.10 of ES Volume 1, Chapter 12 **[APP-049]**, which has been prepared in accordance with industry standard guidance and good practice and aligns with the approach adopted for similar infrastructure projects. It assesses the impact of construction traffic upon driver delay (congestion, including the impact upon driver delay from installing cables within roads), non-motorised user delay, non-motorised user amenity, severance, public transport delay, road safety (including Yarnton Road, Cassington Road and Burleigh Road) 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. In undertaking the assessments, section 12.7 of ES Volume 1, Chapter 12 **[APP-049]** and Appendix 12.6 Construction Vehicle Trip Generation Assumptions **[APP-204]** sets out an access strategy for construction vehicles whereby the Project will be constructed from the compounds using internal access tracks and without reliance upon the public highway as far as possible. There are some fields that cannot be accessed using internal access tracks and materials for these fields will be delivered to the compounds and then transferred to those fields using tractors and trailers. This access strategy restricts construction HGVs to only suitable parts of the road network. As part of this access strategy, construction HGVs delivering day-to-day materials will not travel through Cassington. This access strategy is set out as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 **[APP-232]** and is secured at Schedule 13 of the Development Consent Order **[APP-015]**. The comments made at Issue Specific Hearing 1 on Thursday 15 May 2025 were in response to a direct question from the Examining Authority whereby it was queried how no significant effects could be reported when there were some high percentage increases in HGVs on some roads. The Applicant responded by explaining the above assessment and also sought to clarify the percentage increases form an initial screening process in advance of undertaking those assessments to determine any significant effects, as set out in section 12.10 of ES Volume 1, Chapter 12 **[APP-049]**. The Applicants response is set out in Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) (Rev P0) **[REP1-019]**.	Traffic Transport and Access
REP1-178	Stephen Hurst	Summary - general objection to Botley West Solar power station.	The Applicant notes the comments made by Mr Hurst in his response to the ExA.	Acknowledgement
REP1-179	Steven Jenkins	I am here to raise concerns about the impact of this development on notable, veteran, and ancient trees within and around the application area. I believe the risk of damage, decline or loss of important trees has not been fully assessed by the Applicant and that there are omissions, and poor presentation and assessment within the application. My specific concern is for trees that form part of the ancient woodlands in the Central Area at Pinsley Wood, Burleigh Wood, Bladon Heath and Worton Heath. Across the whole Botley West site there are other areas of ancient woodland and an ancient green lane at Dornford impacted. The high value trees contained within hedgerows and boundary lines mark out and form a major element of the setting of this part of Oxfordshire.I wish to bring the Inspector's attention to the following points drawn from	A comprehensive veteran tree survey has been completed over the whole site area. The methodology used to determine veteran trees (as opposed to other important trees such as mature or "notable" trees) has adopted a recognised approach which has been tested within a variety of other T&CPA and DCO situations. The method which was employed in these other applications was not called into question by a number of other arboricultural specialists, including tree officers. The veteran tree survey was completed by qualified and experienced arboricultural consultants. Utilising the comprehensive survey data, appropriate and specific buffers have been assigned to each veteran tree. These accord with the recognised Natural / Forestry England guidance.	Trees Plants and Flora

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		local knowledge, field work and observation of these ancient woodlands and individual high value trees: 1. Volunteer field work confirms veteran and notable trees exist in large numbers within and adjacent to these ancient woodlands. 2. Volunteers have recorded 60 trees in and around the ancient woodlands listed above. These include non-significant, notable and veteran trees. 3. Of these, The Woodland Trust's Ancient Tree Inventory (ATI) lists 25 Oak, Ash and Horse Chestnut trees which have been verified by the Trust's specialist assessors. 10 specimens are verified veteran trees (registration numbers in Appendix 1). 4. A number of the trees listed on the ATI do not appear in the Applicant's submission. 5. Many more trees have been recorded, measured and assessed by volunteers. 6. A significant proportion of the high value trees present exist around the perimeter of the woodlands and as a result are particularly at risk from being directly exposed to the installation of solar equipment and infrastructure, and cable routing. 7. The Applicant proposes cable route options that pass very close, adjacent to and, in some instances, underneath high value trees. Examples of high-risk pinch points within the Applicant's submission are located at: a. Bladon Heath 'spur' near Heath Lane and Manor Road. b. Cassington Lane near Burleigh Lodge. c. Worton Heath boundary with Merton College land where a cable route option runs adjacent to ancient woodland for almost 500m. The routes and pinch points increase the risk of damage to trees and woodland. Alternative solutions that avoid this increased risk would be preferable. 8. The scale of the proposal creates a situation where ancient woodlands are significantly or completely surrounded. This size of this development is much larger than and isolates the woodlands themselves. Buffer zones and new hedgerows are proposed but there is no mitigation proposed for the effect of woodland isolation or fragmentation. The Applicant has previously assessed the magnitude of impact on ancient woodland as "no change" without, as far as I can see, producing a robust evidence-based assessment of the impact of the development on ancient woodlands or woodland species that rely on adjacent habitat for dispersal and feeding. There is a clear failure to identify threats in the Applicant's Veterans Tree Survey Report. The report falls short in several key areas: a. Omissions – there are examples of veteran and notable trees located within, adjacent and close to the site that are not included in the report. b. Buffer Zones – the report takes a simple standardised approach to buffer zones. This risks encroachment into canopy areas and root protection zones. c. Indirect Impacts – there is little attention paid to indirect impact such as hydrological changes, soil degradation, and increased exposure to wind and light – all of which are relevant to sensitive, aged trees. In short, the report underrepresents the scale and seriousness of risk to irreplaceable trees across the site. At Appendix 2 I show photographs of 4 veteran Oak and Ash trees standing close to or on field margins and cable route options. The photos on the left in full leaf are taken by local residents. The photos on the right by the developer. Except for the 4th tree – a veteran Oak tree – completely omitted – missed - from the Applicant's submission. How many more are there?	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 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 tree root systems.	
REP1-179	Steven Jenkins	I also want to raise concerns regarding the Draft Development Consent Order (DCO) as it relates to trees and hedgerows. In the DCO reference APP-015, Part 6, Schedule 38 and Schedule 39 it is proposed that, once issued, the undertaker: (38.1) "may fell or lop any tree or shrub near any part of the authorised development or cut back its roots, if it reasonably believes it to be necessary to do so to prevent the tree or shrub from— (a) obstructing or interfering with the purposes of the authorised development or any apparatus used in connection with the authorised development; …. (c) obstructing or interfering with the passage of vehicles to the extent necessary for the purposes of construction or decommissioning of the authorised development. And:	Article 38 is based on a model provision included in numerous made DCOs. The provision is required for safety reasons and its applicability is appropriately limited. For example, it is subject to reasonableness (see Article 38(1) and 'reasonably believes') and only applies where there is potential obstruction, danger or interference with vehicles. Further, Article 38(6) provides that the undertaker may not fell or lop a tree or remove hedgerows under this Article within the extent of the publicly maintainable highway without the prior consent of the highway authority. Compensation is provided for too, if loss or damage is caused (see Article 36(2)). This drafting is included within the recently made East Yorkshire Solar Farm Order 2025. 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	Planning Policy

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		(39.1) "may fell or lop any tree that is subject to a tree preservation order within or overhanging land within the Order limits or cut back its roots, if it reasonably believes it to be necessary to do so in order to prevent the tree from obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development." The powers requested are very wide. They override existing protection and create significant risk to ancient woodlands, high value trees and hedgerows across the site. Recent cases in the media serve to highlight the risk to protected high value trees (for example, the 'criminal' Sycamore Gap loss and 'incompetent' Toby Enfield Oak loss). I believe the powers requested here are excessive and unnecessary.	where required by the street authority. Namely: "*where an individual tree subject to a TPO must be removed to facilitate part of the scheme and the local authority requires replacement, a new tree of equivalent species and ultimate size will be agreed with the LPA. Planted in the same place or as near as reasonably practicable to the position of the removed tree, subject to operational requirements. Replacement planting for individual trees will utilise Standard tree stock (8- 10cm girth) and will be planted in the next planting season following removal. The final species and planting location will be agreed in advance with the LPA".* The power to fell trees subject to tree preservation orders has strong precedent in made solar DCOs, including The Gate Burton Energy Park Order 2024, The West Burton Solar Project Order 2025 and The East Yorkshire Solar Farm Order 2025.	
REP1-180	Stuart Brooks	The Applicant has failed to adequately discuss alterna8ves to the construction of a solar farm of the size of Botley West in such a sensitive location. By way of example, the potential benefits of distributed generation have been discussed. The operation of smaller solar farm in this location as part of a distributed generation strategy should be considered.	The Applicant disagrees with the IP's claim that they have failed top adequately discuss alternatives. Alternatives have been and may continue to be the subject of the examination. To date Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered **[APP-042]**. The NPS policy on 'Alternatives', is set out in NPS EN-1, para 4.3.15 – it follows the EIA regulations i.e. information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. **[APP-042]**. Do nothing Site location and scale; Site layout and design; Choice of solar array; Cable corridor route and laying method These sections answer in detail the way in which the site was selected and how the Applicant has dealt with cable routing (see Figures 5.1 to 5.5 **[APP-119 to APP-123]**. The overall approach is found at paras 5.1.1 to 5.2.10 and then at 5.3.1 to 5.3.3 of **[APP-042]**. References to the policy context for the consideration of alternatives and how the site was selected, and the factors that influenced this, can be found at paras 5.2.3 to 5.2.10 and again at paras 5.6.1 to 5.6.17.	Site Selection and Cable Route Alternatives
REP1-181	Sylvia Hurst	General objections to the project, including impact on Green Belt, setting of Hanborough Church, ecology and biodiversity, length of consent, drainage, landscape and visual impacts, tourism and heritage, and the availability of alternative brownfield sites.	The Applicant notes the written submission from Ms Hurst, and considers that the comments are addressed within the relevant sections of the Applicant's Response to Relevant Representations **[REP1-020]**.	Acknowledgement