



Botley West Solar Farm

Applicant's Responses to D1 Submissions Submitted at
Deadline 1

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Approval for issue

Jonathan Alsop

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Contents

1	Introduction.....	1
1.1	Purpose of this Document	1
1.2	Structure of this document	1
2	Applicant's Responses to Representations provided at Deadline 1	4
2.1	Local Authorities and Statutory Consultees	4
2.2	Non-Statutory Consultees	12
2.3	Public/Landowner.....	33

Tables

Table 1.1:	List of Interested Parties that submitted Representations at Deadline 1	1
Table 2.1:	Applicant's Responses to Representations provided at Deadline 1 – Local Authorities and Statutory Consultees.....	4
Table 2.2:	Applicant's Responses to Representations provided at Deadline 1 – Non-Statutory Consultees	12
Table 2.3:	Applicant's Responses to Representations provided at Deadline 1 – Public/Landowner	33

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 other Deadline 1 (D1) submissions 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], in response to the Procedural Deadlines, 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:
- Table 2.1: Applicant's Responses to Representations submitted at Deadline 1 – Local Authorities and Statutory Consultees
 - Table 2.2: Applicant's Responses to Representations submitted at Deadline 1 – Non-Statutory Consultees
 - Table 2.3: Applicant's Responses to Representations submitted at Deadline 1 – Public/Landowner
- 1.2.2 Submissions received by Interested Parties are presented as verbatim text (unless it has been more appropriate to summarise) and are then responded to by setting out the Applicant's position on the matter at the time of writing.
- 1.2.3 To increase the conciseness of this document similar points have been grouped together and summarised. The reference number column in the tables below refers to the reference given to the submissions made by Interested Parties.
- 1.2.4 The documents submitted with the Application are also referenced in this document, using the reference number [APP/x.y], where the last three numbers are the application document number, as set out in the Examination Library. All documents are also presented in numerical order in the Guide to the Application [REP1-002].

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

Examination Reference Number	Interested Party
REP1-051	Cassington Parish Council
REP1-053	Cherwell District Council
REP1-054	Cherwell District Council
REP1-055	Cherwell District Council
REP1-065	Cumnor Parish Council
REP1-066	Oxford City Council

Examination Reference Number	Interested Party
REP1-067	Oxfordshire County Council
REP1-068	Oxfordshire County Council
REP1-069	Oxfordshire County Council
REP1-071	Oxfordshire Host Authorities
REP1-073	Oxfordshire Host Authorities
REP1-074	Vale of White Horse District Council
REP1-077	Vale of White Horse District Council
REP1-078	West Oxfordshire District Council
REP1-079	West Oxfordshire District Council
REP1-080	West Oxfordshire District Council
REP1-083	Environment Agency
REP1-084	Forestry Commission
REP1-089	Begbroke and Yarnton Green Belt Campaign
REP1-090	Begbroke and Yarnton Green Belt Campaign
REP1-096	Begbroke and Yarnton Green Belt Campaign
REP1-098	Blenheim Palace
REP1-099	CPRE Oxfordshire
REP1-100	CPRE Oxfordshire
REP1-101	Forever Fields
REP1-102	Forever Fields
REP1-105	Low Carbon Hub
REP1-107	Oxford Aviation Services Limited
REP1-112	Southill Community Energy
REP1-113	Stop Botley West
REP1-114	Stop Botley West
REP1-116	Stop Botley West
REP1-117	Stop Botley West
REP1-118	Stop Botley West
REP1-121	Sustainable Woodstock
REP1-122	Sustainable Woodstock
REP1-123	Sustainable Woodstock
REP1-124	Sustainable Woodstock
REP1-125	Sustainable Woodstock
REP1-127	The Chancellor Masters and Scholars of the University of Oxford
REP1-130	Anthony Thompson
REP1-133	Bojan Ivanovic

Examination Reference Number	Interested Party
REP1-136	Councillor Dan Levy
REP1-138	David Beaumont
REP1-139	David Foster
REP1-140	David Sherratt
REP1-143	Dustin Sean Dryden
REP1-145	George David William Smith
REP1-146	Graham Brown
REP1-149	Harry St John
REP1-150	John Corlett
REP1-151	John Michael Gee
REP1-152	Jonathan Ford
REP1-153	Michael Brown
REP1-154	Michael Brown
REP1-157	Michael Field
REP1-158	Michael Field
REP1-159	Michael Field
REP1-164	Professor David J Rogers
REP1-165	Professor David J Rogers
REP1-166	Professor David J Rogers
REP1-167	Professor David J Rogers
REP1-168	Professor David J Rogers
REP1-169	Professor David J Rogers
REP1-173	Roderick Cooke
REP1-175	Rosemary Lewis
REP1-182	Tim Sumner
REP1-183	Tom Lewis
REP1-184	Tom Lewis
REP1-185	Tom Lewis
REP1-186	Tom Lewis
REP1-187	Tom Lewis
REP1-188	Vincent Goodstadt
REP1-189	Ian Leggett

2 Applicant's Responses to Representations provided at Deadline 1

2.1 Local Authorities and Statutory Consultees

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

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-051	Cassington Parish Council	Cassington Parish will be one of the most severely impacted areas if this development is accepted in its present form. 50% of the Parish will be taken up by the development with severe impacts on the landscape, on our farmland, local heritage, amenity of our residents, on nature and on flood risk.	The Applicant acknowledges the concerns raised by Cassington Parish regarding the potential impacts of the Proposed Development, particularly about landscape, farmland, local heritage, residential amenity, nature conservation, and flood risk. Regarding flood risk, Flood risk assessments have been prepared in line with the National Planning Policy Framework and Environment Agency guidance. An Outline Surface water drainage Strategy is designed to ensure no increase in flood risk to Cassington or surrounding areas, incorporating sustainable drainage systems (SuDS). As required by NPS EN-1, the Proposed Development has been sequentially located in Flood Zone 1, with solar PV modules and associated ancillary infrastructure located within Flood Zone 1 – there is a low risk of flooding from all sources. Temporary construction compounds and permanent access tracks for the Proposed Development are located within Flood Zone 1, 2 and 3 and have been subjected to the sequential test and exception test as set out in the Hydrology and Flood Risk chapter of the ES [APP-047].	Hydrology and Flood risk
REP1-051	Cassington Parish Council	As outlined in our Relevant Representation we have identified likely significant impacts of the proposed solar power station on bats, farmland birds and potentially mammals. The site has been identified in the ES as of international significance for bats and there is clear scientific, peer-reviewed evidence of significant impacts on bat population by solar farms in the UK (RR-0135). We also contest the applicants have not adequately considered habitat connectivity in the ES and the likely impacts on farmland birds of this proposal. Furthermore, the effectiveness of skylark plots in maintaining the current population of breeding skylarks across the development site is unproven in terms of its effectiveness. We contest that the matter of impacts on Ecology are significant, especially for bats and farmland birds and therefore this topic should be in the list of Principal Issues for Assessment. Please see report for further details.	Additional work with respect to the impacts of the Project on bats is being undertaken, following discussions with Natural England. The results of this work will inform the scale of necessary buffers to bat foraging and commuting flight lines and will be set out in a bat technical note to be provided into Examination. The impact on connectivity of the Project is assessed in ES Chapter 9 [PDB-008]. The proposed skylark plots are designed to support breeding skylark by providing enhanced foraging opportunities within the solar arrays rather than being used for nesting. Nesting opportunities for skylark and other ground-nesting birds will be provided within the Project through the management of the archaeological areas (circa 35ha) and the buffer to be created around Bladon village, as set out in Change Request 2.	Local Ecology and Nature
REP1-053	Cherwell District Council	Response by Cherwell District Council to Action Point 17	The Applicant notes CDC's response to the ExA on Action Point 17 requested at the Issue Specific Hearing, in terms of the extent to which the LPA was engaged in discussions about the preparation of the ES. The Applicant notes and agrees the details of engagement described in respect of Landscape and Visual Impact Assessment approach, methodology and selection of representative views. The Applicant also notes and agrees the points made in respect of draft SoCGs and discussions on Ecology, Agricultural Land and PRoW, hydrology and noise and vibration. It is, nevertheless, the case that the methodologies, baseline and study areas were described by the Applicant in the Scoping Report and the PEIR stages of the submission, and that on-going engagement with officers, including under a PPA, has progressed from early 2023.	Acknowledgement
REP1-054	Cherwell District Council	Written summaries of oral submissions given at Open Floor Hearing 1 held on Tuesday 13 May 2025	The Applicant notes CDC's response to the ExA, in regard to the OFH1, and that the assessment of TCPA applications for solar farms would normally be under Policy ESD5 of the adopted Cherwell Local Plan.	Acknowledgement
REP1-055	Cherwell District Council	Written summaries of oral submissions given at the Preliminary Meeting held on Tuesday 13 May 2025	The Applicant notes CDC's response to the ExA on these items, including those of 'no comment' and those where CDC asked the EXA to consider Ecology, Coalescence and Aviation Activities to the list of Principal Issues.	Acknowledgement
REP1-065	Cumnor Parish Council	Written summaries of oral submissions given at Open Floor Hearing 1 held on Tuesday 13 May 2025.	The Applicant notes the summary of Cumnor Parish Council's oral submission given at OFH1, including the PC's views regarding the Southern Site and the NGET substation. The Applicant's response to Cumnor Parish Council's detailed comments, including landscape and visual impacts, are provided elsewhere within the Applicant's response tables to the Written Representations [EN010147/APP/12.4].	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	3.1 Noted. 3.2/3.3 The Applicant's response to the Host Authorities' RRs was submitted at Deadline 1 [REP1-020].	Local Ecology and Nature

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>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).</p> <p>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).</p> <p>3.4.The Host Authorities will expand on these issues in a joint Local Impact Report to be submitted at Deadline 1.</p> <p>3.5.Given the potential for significant impact on protected species, and priority habitats 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.</p>	<p>3.4 The Applicant's response to the LIR is set out within this document.</p> <p>3.5 Noted.</p>	
REP1-066	Oxford City Council	Request by Oxford City Council to become an Interested Party, after the deadline for registration has passed (27 Feb 25).	This request is at the discretion of the Examining Authority to accept, not the Applicant.	Legal
REP1-068	Oxfordshire County Council	Oxfordshire County Council's Response to Action Point 17 of ISH1	<p>The Applicant notes OCC's response to the ExA on Action Point 17 in response to clarifying its inputs to the Environmental Statement, including baseline, background data and methodologies.</p> <p>The Applicant notes and agrees the details of engagement described in respect of Landscape and Visual Impact Assessment approach, methodology and selection of representative views. The Applicant also notes and agrees the points made in respect of discussions on Ecology and PRoW.</p> <p>It is, nevertheless, the case that the methodologies, baseline and study areas were described by the Applicant in the Scoping Report and the PEIR stages of the submission, and that on-going engagement with officers, including under a PPA, has progressed from early 2023.</p> <p>The Applicant does not agree that the regular meetings with lead officers 'focussed on the progress of the project rather than specific technical topics' as they were designed to consider those areas of the host authorities remit that needed to be considered.</p> <p>The particular issue of the assessment methodology, the differing views on the significance of effects and mitigation, and upon the safeguarded mineral resource, are considered in the Applicant's responses to the LIR and in the previous Applicant's Responses to Relevant Representations. [REP1-020].</p>	Acknowledgement
REP1-069	Oxfordshire County Council	<p>At ISH1 OCC's only referred to the 'downplaying' of significance within the context of the applicant's assessment of landscape and visual impacts. OCC would refer the ExA to chapter 1 of our Relevant Representation [RR-0793] and to section 7.3 of the joint Local Impact Report submitted alongside this written response at Deadline 1 where the Oxfordshire Host Authorities (OHA) expand on their concerns around the assessment of the significance of the impacts on the landscape. In summary, the OHA maintain that the approach and methodology used in the Landscape and Visual Impact Assessment (LVIA) [PDB-006] underplays the impact of the development on local landscape character and views; the LVIA assesses the development as not causing significant effects on the landscape character, and with regard to visual effects no significant effects are anticipated by year 15. The OHA consider the proposed development would result in significant effects to both Landscape Character and Views. OCC has also submitted at Deadline 1 a written representation in response to action point 17 of ISH1. In this response OCC outlines that the council voiced concerns around the assessment of the level of significance with regards to Landscape impacts as far back as 2023. The applicant failed to address any of the concerns OCC raised in relation to the assessment of significance within the submitted application documents. To date, the council's commentary has focussed on commenting on the information provided by the applicant and as such has considered the application on its own merits. However, given the importance of precedent within the NSIP regime OCC would like to draw the attention of the ExA to 9 previous Solar Farm NSIP developments, all of which are smaller in capacity than the proposed scheme. All 9 of these schemes assessed the landscape impacts as either moderate or major:</p> <p>Cottam (600MW) Major and Moderate</p> <p>Little Crow (150MW) Major, Major/Moderate and some cases Moderate</p> <p>Cleve Hill (373MW) Major and Moderate</p> <p>Mallard Pass (350MW) Major and Major/Moderate</p> <p>Gate Burton (500MW) Major and Moderate</p>	Please refer to response to Question 1.14.10 of the ExA's First Written Questions [EN010147/APP/12.2].	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>Sunnica (500MW) Major and Moderate</p> <p>Heckington Fen (500MW) Major</p> <p>West Burton (480MW) Major and Moderate</p> <p>East Yorkshire (400MW) Major and Moderate</p> <p>The schemes listed above are of a smaller scale than the proposed development and given that some of these schemes, such as Sunnica, are in areas which are predominantly flat it seems unrealistic to the Council that Botley West Solar Farm would only result in minor to moderate adverse effects. As such, given this and the council's well documented concerns around the applicant's assessment of the landscape and visual impacts the council considers the applicant to have 'downplayed' the landscape impacts of the scheme.</p>		
REP1-071	Oxfordshire Host Authorities	<p>3a The Rochdale Envelope, flexibility and the environmental statement</p> <p>Query on ES clarification report [PDB-015] – point ES3.</p> <p>In para 2.4.2 it states the LVIA assessment has taken account of these project design parameters, including the NGET substation, and it correctly assumes that the height of the NGET substation is between 12m to 12.5m. Para 2.4.3 states References to a height of 15m in the Guide to the Application [AS-002], and Statement of Statutory Nuisance [APP-018], are not accurate. These documents have been updated.</p> <p>However, in the statement of statutory nuisance [PDB-004 / 005] at paragraph 1.4.10 it is stated that the area required to be set aside for the NGET substation amounts to an area of up to 3.8ha. Within that area it is assumed that the substation itself will occupy a footprint of approximately 87m by 30m, with a maximum building height of 12m, excluding connecting tower structures. This is secured in the Outline Layout & Design Principles (as submitted alongside this Procedural Deadline B submission). It is understood, from NGET, that the building containing the switchgear will be 14m high, 16m wide and 76m in length, with an annexe building alongside, which will be 3.6m high, 15m wide and 76m in length.</p>	<p>See the Applicant's response to the ExA's Q1.7.25. In summary, the Applicant has updated and submitted the Guide to the Application, the Statement of Statutory Nuisance, the Explanatory Memorandum and the Outline Layout & Design Principles as part of this Deadline 2 submission to clarify the correct parameters that are intended to be secured.</p>	Project description and Design parameters
REP1-071	Oxfordshire Host Authorities	<p>3h Climate Change</p> <p>The OHAs all acknowledge the positive effect that the production of solar energy will have with regards to combatting climate change.</p> <p>However, the OHAs note that paragraph 4.10.1 of NPS EN-1 states that '...If new energy infrastructure is not sufficiently resilient against the possible impacts of climate change, it will not be able to satisfy the energy needs as outlined in Part 3 of this NPS.' The OHAs also note that the applicants Supplementary Statement of Need [PBD-014] is heavily reliant on the ability of the project to satisfy the energy needs described within EN-1.</p> <p>OHAs expressed concern in ISH1 around the climate resilience of the proposed scheme and noted that the applicant had chosen to scope out climate related risks from the ES (Table 14.6 (issues scoped out of the assessment) of [APP-051]).</p> <p>The OHAs believe that the applicant did not provide a clear scientific justification for excluding potential climate risks from the assessment and invite the applicant to provide further details on how it has considered, and responds to, the OCC Climate Risk Assessment in order to demonstrate a broader understanding of potential future risks that could disrupt the solar farm.</p> <p>Some of the OHA's specific concerns with regard to Climate Resilience are listed below:</p> <ul style="list-style-type: none"> The lack of consideration within the design of extreme weather events including storms, flooding and extreme heat. There is no evidence that the Climate Change chapter of the ES [APP-051] and Outline Operational Management Plan [APP-234] will take climate hazards into account during the maintenance process. Further consideration is required of the Outline GHG Reduction Strategy [APP-216] which makes no mention of the potential for increased carbon sequestration on the site. There are also opportunities to simultaneously increase carbon sequestration through appropriate planting and land management, which would reduce flood risk and minimise other impacts which could subsequently lead to emission of greenhouse gases, such as soil erosion from runoff. The GHG emissions from the transport of the panels from their place of manufacture to the application site has not been adequately assessed and considered. <p>The OHAs will elaborate further on the climate resilience of the scheme within section 7.10 of the joint LIR"</p>	<p>Increased ambient temperatures as a result of climate change were scoped out as the manufacturing standards for PV modules IEC TS 63126:2020, IEC 62548 and IEC 61215-1:2021 require modules to be functional over a wide range of temperatures, humidity and UV radiation.</p> <p>Extreme weather events such as storms with high winds are also possible in the existing and future baseline and the Project's design will need to account for this. Manufacturing standards for PV modules (listed above) require consideration for extensive weathering (such as from hailstorms) and extreme thermal fluctuations. As such, extreme weather events are not considered to cause significant environmental effects to the Project.</p> <p>At Deadline 1 the Applicant prepared a document which details the methodology and approach undertaken at the scoping stage concerning potential climate change effects on the Project which were scoped out of the climate change chapter [APP-051]. The document refers to design considerations and standards which design out significant risks due to climatic variations. This is included at Appendix 2 of [REP1-019].</p> <p>Table 14.9 of the climate change chapter [APP-051] includes a list of project elements which have been included within the maximum design scenario for the greenhouse gas (GHG) assessment. All major materials for the Project were included as part of the scope of assessment including transportation emissions.</p> <p>As is referenced in paragraph 14.9.2 the assessment has included consideration of life cycle assessment stages A1-A5 which includes the extraction, processing, delivery and construction processes for all material specified within Table 14.9 maximum design scenario. As such, emissions associated with the manufacture, transport and installation have been considered.</p>	Climate Change

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-071	Oxfordshire Host Authorities	<p>3c Cultural heritage</p> <p>Oxfordshire County Council requested that the ExA require the submission of an Archaeological Evaluation Report by the applicant into the examination once this report has been completed by the applicant. The Council will comment on the adequacy of this survey as well as the applicant's assessment of the significance of any identified archaeological remains in a separate written representation once the Evaluation Report has been submitted. Oxfordshire County Council requests that this future written submission by the council be accepted into the examination and given due regard by the ExA once it has been submitted.</p> <p>The OHAs will further expand on the impacts relating to cultural heritage and the historic environment within section 7.2 of the joint Local Impact Report to be submitted at Deadline 1.</p>	Evaluation reports setting out the results of the programme of trial trenching are currently being prepared. It is anticipated that that these reports will be submitted at Deadline 5.	Historic Environment
REP1-071	Oxfordshire Host Authorities	<p>3i Noise and Vibration</p> <p>The OHAs raised concerns around the noise impacts that would result from the piling operations during the construction phase. This impact would be exacerbated by the applicant's proposed construction hours which would be 7:00-19:00 Monday-Saturday. The standard hours normally expected for construction works by the OHA would be 8:00-18:00 weekdays, 08:00-12:00 on Saturdays. The additional construction hours proposed by the applicant would result in a greater impact on the local residents in terms of noise. The OHAs believe that the applicant's assessment of the background noise levels needs to be robustly justified by the applicant as these form the baseline for the assessment of significance of noise impacts. The OHAs contend that the applicant will need to employ monitoring of the level of noise generated by the development throughout the operational phase to ensure the noise levels remain within the industry standards outlined by the applicant. If the noise levels exceed the industry standards then the applicant will need to take action to prevent a significant impact.</p> <p>Tranquillity on the PRoW network is intrinsic to how the countryside and the PRoW network is enjoyed by the public. As such the OHA believe that the noise impact on the PRoW network at all phases of the proposed development should be assessed within the applicants ES. The OHA's will further elaborate on the noise and vibration impacts associated with the scheme at Section 7.9 of the joint Local Impact Report.</p>	<p>The Applicant confirms that the Outline Code of Construction Practice [APP-232 & 233] (oCoC) at Section 1.8 General Requirements, paragraph 1.8.2, seeks core working hours for the construction phases of the Project, to be secured through the DCO, and that these are proposed to be 07:00 to 19:00 Monday to Saturday.</p> <p>The working hours for the construction of the Solar Farm, have been calculated based on 7am-7pm, Monday to Saturday 52 weeks of the year, this is required to minimise the overall Construction programme period. This will be used bring in people and materials to the four construction compounds, and access sites, in a safe phased manner. This helps manage traffic flow, logistics and welfare for the operatives arriving, working on the site and departing.</p> <p>The Background Sound Levels have been robustly defined in 6.3 - ES Chapter 13 - Noise and Vibration [APP-050] and 6.5 ES - Appendix 13.1 Baseline Sound Survey [APP-211].</p> <p>The main focus of this assessment is to determine the potential noise and vibration impact of the development on residential receptors during all phases. However, a review has been undertaken of the PROW in the area, and it has identified only a small number which will cross the Site. It is possible that noise from the each phase of the development units will be slightly audible in some areas of some PROW which cross the Site. However, it is not uncommon for construction or industrial noise to be audible on PROWs, as is experienced alongside the Siemens factory in Whitney. Furthermore, receptors on PROW are transient, and so any potential impact experienced by noise from the development during any phase, whilst on a PROW, would be for a very short period of time, thereby reducing the magnitude of any impact.</p>	Noise and Vibration Impact
REP1-071	Oxfordshire Host Authorities	<p>3j Traffic and Transport</p> <p>Oxfordshire County Council as Highways Authority would welcome amendments to the Outline Operational Management Plan [APP-234] which would make clear the methodologies and timelines proposed for the replacement of panels within the scheme. In particular we would welcome clarity on the potential highways impacts of the operational maintenance of the panels to ensure that any potential impacts can be considered under a Construction Traffic Management Plan or similar document.</p> <p>The OHAs will further expand on the topic of Traffic and Transport (including Public Rights of Way) within section 7.8 of the joint LIR</p>	<p>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.</p> <p>Paragraph 6.4.9 of ES Chapter 6 Project Description [APP-043] sets out that it is not anticipated that wholesale maintenance or replacement would be required.</p> <p>Table 12.7 of ES Chapter 12 [APP-049] sets out that maintenance activities would generate a light vehicle daily / weekly.</p> <p>As part of that maintenance, upon identification of a module failure / deterioration, modules and components would either be contained within the maintenance vehicle and replaced as required or would be brought to site the next day / visit as part of their regular and ongoing maintenance process and replaced.</p> <p>The Applicant notes Oxfordshire County Council's comment and confirms it is in ongoing dialogue with Oxfordshire County Council and will discuss the Outline Operational Management Plan [APP-234] together with progressing a Statement of Common Ground.</p>	Traffic Transport and Access
REP1-071	Oxfordshire Host Authorities	<p>During Issue Specific Hearing 1, there was a discussion on whether a Grampian condition should be included in the draft DCO preventing the undertaker from (i) exercising compulsory purchase powers and (ii) commencing the authorised development until planning permission has been granted for the proposed National Grid substation. The OHAs consider such a provision would be sensible because it would ensure that infrastructure which is important to the instant application has been consented before the instant works can be commenced.</p>	<p>The Applicant's position, as set out at Issue Specific Hearing 1, remains that a Grampian condition is not necessary. Please refer to the Applicant's Written Summary of Oral Submissions at Issue Specific Hearing 1 [REP1-019].</p>	Legal
REP1-071	Oxfordshire Host Authorities	<p>3f Development Consent Order</p> <p>OHA's key areas of concern:</p> <ul style="list-style-type: none"> The broad range of powers to undertake works to the highway without consent of the Highways Authority. 	<p>Each key area of concern has been responded to below.</p> <p>Highways Powers</p> <p>As set out Explanatory Memorandum, permanent alterations to streets identified at Part 1 of Schedule 5 of the draft DCO must be completed to the reasonable satisfaction of the</p>	DCO Process

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<ul style="list-style-type: none"> The lack of resourcing for the Host Authorities for post consent work including highways auditing and monitoring and the discharge of requirements. The lack of time to submit a request for further information for the discharge of requirements as outlined in Schedule 6 (10 days are likely to be insufficient time to consult third parties). The broad range of powers to remove hedgerows and trees. The Host Authorities would like to see the protective provisions surrounding drainage consent brought into line with the LDA. VOWHDC would like to see a requirement to secure protective measures for the Milestone on Oxford Road. OHAs also seek to secure a post consent Planning Performance Agreement via a Requirement in the DCO to ensure the councils are adequately resourced for any discharge of requirements and post consent work. OHAs will elaborate on these points within chapter 8 of the joint LIR submitted at Deadline 1. 	<p>highway authority. There are a range of other mechanisms within the draft DCO that require consultation with the relevant Highway Authority, or their approval. For example:</p> <ul style="list-style-type: none"> Article 14, regarding access to works; Article 18, regarding authority to survey and investigate late; and Article 38(6), regarding felling or lopping trees, or removing hedgerows within the public highway. <p>On that basis, both the OHAs, and Highways Authority should have comfort that there remain a range of mechanisms within the draft DCO to ensure any Highways Powers exercised by the Applicant are subject to input from the Highways Authority.</p> <p>Host Authority resourcing</p> <p>The draft DCO provides a mechanism for the Host Authorities to recover their fees from the Applicant in processing the discharge of a requirement. This is set out at Article 45 and Schedule 16, paragraph 5 of the Draft DCO, which provides that the fee prescribed under regulation 16(1)(b) of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits)(England) Regulations 2012(a) (as may be amended or replaced from time to time) is to apply for the discharge of each requirement (whether dealt with in separate applications or combined within a single application) and must be paid to the relevant planning authority for each application. On this basis, a separate Planning Performance Agreement is not considered to be specifically required to provide for resourcing on the discharge of requirements, but the Applicant will continue to engage with LPAs on all matters relating to Planning Performance Agreements.</p> <p>Under Part 8 of the Planning Act 2008, there are also a range of monitoring and enforcement powers available to LPAs regarding a DCO.</p> <p>Timeframes for submitting a request for further information for the discharge of requirements</p> <p>Schedule 6 of the draft DCO does not refer to timeframes relating to the discharge of requirements so the Applicant has assumed the concern relates to timeframes specified in Schedule 16 of the draft DCO. The Applicant considers that 10 days for consulting with third parties strikes an appropriate balance between providing sufficient time for any consultation to take place, without unduly delaying the discharging of requirements in the implementation of the DCO.</p> <p>Powers for the removal of hedgerows and trees</p> <p>The powers associated with hedgerow and tree removal under Article 38 of the draft DCO are based on model provisions included in numerous DCOs that are required to ensure any trees or hedgerows that potentially obstruct or interfere with the authorised development can be appropriately managed. The effects of removal of any hedgerows and trees as part of the Project have been assessed in Chapter 9 of the ES [APP-046], with BNG planting, including significant new hedgerow planting outlined in the Biodiversity Net Gain Assessment [APP-162].</p> <p>Drainage protective provisions</p> <p>Article 6 of the draft DCO sets out what aspects of the Land Drainage Act 1991 are proposed to be disapplied by the DCO. To the extent that any aspects of the Land Drainage Act 1991 remain relevant to the protective provisions included for the protection of drainage authorities, these are being negotiated with those drainage authorities and agreed wording will be incorporated into the draft DCO in due course.</p> <p>Oxford Road Milestone</p> <p>Chapter 7 - Historic Environment of the ES [APP-044] assessed potential effects of the Project on the Oxford Road Milestone. It was concluded that there would be only minor residual adverse effects, with no further mitigation or monitoring required. On that basis the Applicant does not consider it necessary to include a specific requirement within the draft DCO providing specific protections for the Milestone.</p>	
REP1-071	Oxfordshire Host Authorities	VWHDC seeks confirmation on whether the switchgear building is part of the DCO application or not. Switchgear buildings do not always need to be separate buildings, but they often are, especially for high-voltage equipment, so such structures need to be included within Rochdale parameters and LVIA tested at 14m should this be a separate building requirement.	The assessment considers the findings of analysis of the Zone of Theoretical Visibility (ZTV) of the solar farm assets (including any construction working areas) and the identification of Representative Viewpoints. Once the location of the assets were identified, and the ZTV produced, Representative Viewpoints were agreed with relevant stakeholders, including Local Authorities.	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-071	Oxfordshire Host Authorities	<p>3g Landscape and Visual Matters</p> <p>The OHAs confirm that they will expand on the Arboricultural Assessment and Arboricultural Impact Report in section 7.4 of the joint LIR. OHAs confirm there was very little engagement on Landscape and Visual issues throughout the pre-examination period. The Host Authorities were asked to help establish appropriate viewpoints for the LVIA but were otherwise not consulted on the methodology. OHAs elaborate on the engagement with the applicant and the assessment of the significance of effects within section 7.3 of the joint LIR and OHA's individual responses to action point 17 from ISH1.</p>	<p>The maximum 2.3 m high solar arrays of the Project, and dimensions of converter stations and project substation, form the basis of the landscape and visual resources Study Area. The extent of the Study Area has been determined by the findings of the ZTV and refined where necessary. Considering the assets of the Project, the Study Area extends to a 5 km buffer from the outer edges of the Project Site in all directions.</p> <p>Areas from where views of the Project would theoretically be possible were determined by means of the ZTV analysis. Selected visual receptors located within the ZTV, likely to experience visual change were identified through field work, and their sensitivity established in accordance with best practice guidance, as set out in the LVIA methodology.</p> <p>The ZTV is based on the development of solar panel heights up to 2.3 m high; PCS heights of 3.5 m; NGET substation height of 12.5 m; main Project substation height of 11 m and secondary Project substation height of 6 m. The ZTV is based on a viewer height of 2 m.</p> <p>The ZTV shown on figure 8.7, 8.8, 8.9, 8.10 and 8.11 [APP-082 to 085] has been developed based on visual barriers for significant blocks of woodland, at a height of 12 m, and existing settlement, at an indicative height of 9 m. However, the ZTV does not account for visual barriers such as garden vegetation, hedgerows or individual trees. Therefore, the potential intervisibility with the Project would be less in places. This has been tested through fieldwork. Resulting in Representative Viewpoints being relocated or discounted. Representative Viewpoints, included and discounted as part of the consultation process are detailed within the LVIA [APP-045].</p> <p>The ZTV shown on Figure 8.8a [APP-084] shows a 'bare earth' scenario, with only existing settlement barriers and local topography (i.e. no woodland).</p> <p>The ZTV, (Figure 8.7, 8.8, 8.8a, 8.9, 8.10 and 8.11) [APP-082 to 085] indicates that the ZTV for all fields within the northern, central and southern site generally follows the principal development areas of the Project Site, with potential highest visibility confined to within 3 km of the Project Site boundary. The ZTV takes into consideration significant blocks of existing woodland and built form but does not consider the screening effect of all existing vegetation. While the ZTV is a good representation of what might be seen, as it does not take account of smaller blocks of woodland, hedgerows, individual tree cover or garden vegetation, which add to the amount of screening provided by existing vegetation; the ZTV is therefore a worst-case scenario of theoretical visibility.</p> <p>The ZTV is based on the built elements of the Botley West Solar Farm, as set out in Chapter 6: Project Description [APP-043] and detailed within the Maximum Design Scenario for the LVIA at Table 8.19 of the LVIA [APP-045]. The onshore ZTV is based on the tallest buildings of the Mona Onshore substation. The ZTVs have been generated using best practice guidance.</p> <p>The LVIA [APP-045] has assessed the Project as a whole, rather than individual elements of it. However, all built elements within the Project Description [APP-043] have been considered and form part of the assessment.</p>	<p>Landscape and Visual Impacts</p>

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-071	Oxfordshire Host Authorities	<p>3d Green Belt</p> <p>It is established that the proposed development is inappropriate development in the Oxford Green Belt which, by definition, is harmful and carries substantial weight. National policy is clear that for the DCO application to be successful, there must exist Very Special Circumstances (VSC) to justify the use of Green Belt land. The essential characteristics of Green Belts are their openness and their permanence. The harm to Green Belt aims in keeping land permanently open and to Green Belt purposes (to check the unrestricted sprawl of large built-up areas and safeguarding the countryside from encroachment) are not considered to be outweighed by the case for VSC which refers to the harms as being limited, temporary and reversible. OHAs provide more context to this issue in Written Representations and in section 7.1 of the joint LIR.</p>	<p>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.</p> <p>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.</p> <p>However, 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.</p> <p>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.</p> <p>Notwithstanding, the Applicant disagrees with the host authorities conclusion in respect of the VSC case not outweighing the harm.</p>	Green Belt
REP1-079	West Oxfordshire District Council	<p>Downplaying of Significance of effects – Heritage</p> <p>13. With regard to the historic environment, the approach applied to assessment has resulted in likely systemic underestimation of both the importance of assets currently ascribed 'medium' value and sensitivity. This has potentially resulted in similarly systemic under-estimation of effects. The assessment of effects to historic landscapes, is largely divorced from consideration of the rest of the historic environment. This is particularly apparent with regard to the open agricultural landscapes that form the setting of the Blenheim Palace World Heritage Site and Registered Park and Garden. 'Minor adverse' impacts to the historic landscape would not appear to do justice to the extent or totality of change within areas of historic character.</p> <p>14. Mitigation measures are provided without a clear explanation of assets' significance, magnitude of impact and effects deriving from the proposed development. Therefore, the effectiveness of the mitigation is not fully understandable.</p> <p>15. Landscape mitigation, where proposed adjacent to historic environment receptors – particularly conservation areas – appear to have the potential to generate adverse effects in their own right. This is neither acknowledged nor assessed in the chapter. Year 15 visualisations illustrate this for a number of viewpoints. Additional mitigation with regard to setting change – such as screening planting – is rarely effective in reducing levels of effect.</p>	<p>The Applicant respectfully disagrees with the view of WODC that the significance of effects on heritage assets have been downplayed. 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.</p>	Historic Environment
REP1-079	West Oxfordshire District Council	<p>Downplaying of Significance of effects - LVIA</p> <p>5. WODC have consistently referred to the downplaying of impacts, particularly in regard to landscape and heritage impacts throughout engagement with the Botley West DCO.</p> <p>6. At pre-application stage, WODC highlighted that there were omissions from the applicant's assessment of landscape quality that it felt led to a misunderstanding of landscape quality for the project area, particularly in terms of cultural heritage. A number of studies were listed</p> <p>7. At PEIR stage, the applicant explained that the effects on designated heritage assets would be 'not significant' and that impacts on landscape and visual resources would be limited. The Council's Relevant Representation [RR-1102] stated that WODC do not agree with the with the conclusions of the applicant's ES and consider that the applicant has played down the likely significance of impacts arising from the proposed development.</p> <p>11. WODC wish to refer the ExA to the Local Impact Report submitted alongside this written response at Deadline 1 where the Host Authorities (HAs) expand on their concerns around the assessment of the significance of the impacts on the landscape and heritage assets.</p> <p>12. In summary, the OHAs maintain that the approach and methodology used in the Landscape and Visual Impact Assessment (LVIA) [PDB-006] underplays the impact of the development on local landscape character and views; the LVIA assesses the development as not causing significant effects on the landscape character, and with regard to visual effects no significant effects are anticipated by year 15. The OHAs consider the proposed development would result in significant effects to both Landscape Character and Views</p>	<p>Please refer to response to Question 1.14.10 of the ExA's First Written Questions [EN010147/APP/12.2].</p>	Landscape and Visual Impacts
REP1-083	Environmental Agency	<p>Flood Risk & Flood Modelling: EA not agreed with several points as it is still work in progress.</p>	<p>The EA is being consulted to agree an approach to the Flood Risk and Flood Modelling outstanding concerns.</p>	Hydrology and Flood risk

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-083	Environmental Agency	Ecology and Geomorphology: EA not agreed with several points as it is still work in progress.	As set out in the Statement of Common Ground between the Applicant and the Environment Agency [REP1-025] , a number of matters are not agreed. The Applicant is in discussions with the Environment Agency on unagreed matters.	Local Ecology and Nature
REP1-084	Forestry Commission	Request by Forestry Commission to become an Interested Party, after the deadline for registration has passed (27 Feb 25)	This request is at the discretion of the Examining Authority to accept, not the Applicant.	Legal

2.2 Non-Statutory Consultees

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

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-089	Begbroke and Yarnton Green Belt Campaign	<p>BYG would be grateful for clarification in respect of four issues (Summarised):</p> <ul style="list-style-type: none"> The Rule 8 letter does not contain a revised list of Principal Issues. We hoped that it might include the Decommissioning and Funding Issue we raised at ISH1. We were also expecting it would include Aircraft Safety, as this is so fundamental a matter. From what the Local Authorities said at the PM it seems unlikely that the SoCGs and LIRs will be available by 4 June as per D1 in the Rule 6 draft timetable. We would, therefore, be grateful for confirmation that - if the SoCGs and LIRs arrive later than D1 - an extension of the time available to comment on the LIRs will be given. We suggest that as the Examination progresses all those providing expert opinions to ExA should be required to give their qualifications; and particularly those representing the Applicant be required to explain their involvement in the development of the project. Specifically, in respect of Mr Le Cointe, it needs to be officially recognised that he is no longer an independent planning consultant employed by RPS, but is now employed by PVDP. Finally, please can you clarify if and when another version of the Principal Issues list will be published. 	<p>In response to the four matters raised:</p> <ol style="list-style-type: none"> While the Applicant is not responsible for the content of the Rule 8 letter, concerns raised at the Open Floor Hearings and Issue Specific Hearing 1 regarding decommissioning and funding were responded to by the applicant at the hearings, and also set out in the written summaries [REP1-018] and [REP1-019] for each hearing as provided at Deadline 1. We note that a number of questions relating to Oxford Airport have been raised by the Examining Authority in its First Written Questions and Requests for Information [PD-008], which the Applicant will be responding to at Deadline 2. Draft SoCGs were provided by the Applicant at Deadline 1, and where possible the contents of these were shared with relevant parties. Further updates to draft SoCGs will be provided at future deadlines, with the final SoCGs provided at the end of the Examination Period. Regulation 14(4) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the applicant to ensure the Environmental Statement is prepared by competent experts, and to include a statement outlining the relevant expertise and qualifications of such experts [APP-124]. Mr Le Cointe is not employed by PVDP. <p>Throughout the examination process, the intention will be for the key issues to be narrowed as matters become resolved. The key issues to be addressed will be set out through written questions from the Examining Authority, and any other questions or actions arising from hearings.</p>	DCO Process
REP1-090	Begbroke and Yarnton Green Belt Campaign	<p>In our Relevant Representation, in 1. Site selection, alternative sites and site definition, we commented on the Applicant's claim that a site in Oxfordshire was chosen because National Grid had indicated in discussions (my italics) that this would be their preference. [We added further information on this claim in my email to you of 9 April, requesting disclosure of any documents evidencing such discussions.] We pointed out that this claim was puzzling given that a connection to the National Electricity Transmission System (NETS) transmits power across the whole country. Geographical location is therefore of little importance for large scale solar. National Grid has subsequently confirmed in response to an enquiry by the Private Eye magazine (Issue 1647) that they never advise where solar projects should be located. The Applicant's Supplementary Statement of Need includes, in Chapter 3, additional comments on the reasons for siting the project in Oxfordshire and, interestingly, now makes no reference to discussions with National Grid. Instead, there is a complicated treatise on Oxfordshire's wish to see an increase in the use of renewable energy, and on how it will be difficult to connect new generation assets to the existing distribution grid in Oxfordshire for the next six years. This is simply a further exercise in obfuscation since, as we previously pointed out, Oxfordshire would get no direct benefit from a connection that the Botley West project would make to NETS; the project could be sited anywhere in the country.</p>	<p>The Applicant notes Begbroke and Yarnton Green Belt Campaign's comments in their email to PINS on the issues of site selection and the evidence set out in the Supplementary Statement of Need [PDB-014], and the comments of OCC in the County Council's RR.</p> <p>It remains that the Applicant's position on the need for the project set out in the Supplementary Statement of Need [PDB-014] and in the ES Chapter on Alternatives Considered [APP-042] provide the rationale for the proposed connection point.</p>	Acknowledgement
REP1-096	Begbroke and Yarnton Green Belt Campaign	<p>At the PM Dr spoke on matters relating to site selection, already alluded to in BYG's Relevant Representation. He made a general point about the Applicant seemingly not attempting to select a site which avoided impact on "best and most versatile" agricultural land; on the Green Belt; and on the Blenheim Palace World Heritage Site. Dr. also referred at the PM to the Rochdale Envelope and questioned how it would be used in the ExA. Regarding this, requesting Dr. , Chair of BYG, when attendance at the PM submitted BYG's thoughts on this subject in an email. This has been numbered PDA-004. [This matter was also discussed at ISH1.] Finally at the PM, Dr. asked for clarification in respect of the "Brief Amplification" of the Assessment of Alternatives regarding the reference to "preferred routes", "potential routes" and "blocking valve stations". We understand from the ExA's helpful response that the "routes" are cable routes and that the inclusion of blocking valve stations was an error</p>	<p>The Applicant notes the Written Summary of the Begbroke & Yarnton Green Belt Campaign's oral submissions to the Preliminary Hearing and Issue Specific Hearing, as presented to the ExA.</p>	Acknowledgement
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	<p>The maps provided as part of the application show that approx. 53% of Bladon Parish (176 hectares) has been earmarked for the development and all of those 176 hectares falls within the Green Belt. Development on the Green Belt around Bladon is in contradiction to the National Policy Planning Framework (NPPF) unless exceptional circumstances can be proved.</p>	<p>The Applicant has provided an assessment of potential impacts on Green Belt land in its Planning Supporting Statement [APP-225]. That sets out the Very Special Circumstances case for the use of Green Belt Land, including that under NPS EN-1, the starting point is that CNP Infrastructure is considered to have met the tests to justify use of such land.</p>	

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			The Applicant also responded to questions from the Examining Authority on Green Belt impacts at Issue Specific Hearing 1 (agenda item 3d), which have been set out in the Applicant's Written Summary, including further points of clarification [REP1-019] .	
REP1-097	Bladon Village Sir Winston Churchill Memorial Hall	No acceptable exceptional circumstances have been presented in any of the available documents. BVHRC believes that, given the significant impact on a large area of Green Belt, exceptional circumstances to build here rather than in the alternative sites of Northfleet, Kent and Cowley, Oxfordshire - apparently summarily rejected - must be thoroughly justified. The loss of Green Belt is a critical planning consideration and should be afforded substantial weight when reviewing the proposal.	The Applicant has provided an assessment of potential impacts on Green Belt land in its Planning Supporting Statement [APP-225] . That sets out the Very Special Circumstances case for the use of Green Belt Land, including that under NPS EN-1, the starting point is that CNP Infrastructure is considered to have met the tests to justify use of such land. The Applicant also responded to questions from the Examining Authority on Green Belt impacts at Issue Specific Hearing 1 (agenda item 3d), which have been set out in the Applicant's Written Summary, including further points of clarification [REP1-019] .	
REP1-098	Blenheim Palace	Summary: Document from Blenheim Palace, outlining justification for project and answering questions.	The Applicant notes and welcomes the Written Summary of Mr Dominic Hare on behalf of Blenheim Palace 1984 Maintenance Fund and the Vanbrugh Unit Trust, as presented to the ExA at the Open Floor Hearing.	Acknowledgement
REP1-099	CPRE Oxfordshire	Greenbelt Survey; Headlines from the survey: - Over two thirds of respondents claimed to know 'little or nothing' about Green Belts. With one in five respondents saying they'd never heard of the Green Belt. - Over four in five respondents believed the Green Belt surrounding Oxford should remain open and undeveloped, with nearly two thirds of respondents strongly agreeing with this. -The most serious threats to Green Belts were largely seen as house building, with other types of developments (incl. factories, offices, warehouses, and out of town shopping centres) and road building also being considered as serious threats to the Green Belt. - Respondents have mixed feelings about the definition of 'Exceptional Circumstances', with a fairly equal split amongst those who agree and disagree. Although nearly a third of respondents strongly disagree with the statement. -Feelings towards the building of Solar Farms on Green Belt land are also varied. Respondents were balanced in their feelings for and against Solar Farms on Green Belt land (38% agree vs. 41% disagree), with also nearly 1 in 5 having no clear opinion either way.	The Applicant notes the CPRE's survey on 'attitudes towards Green Belts', and the apparent contradictions between the strength of feeling on protecting the Oxford Green Belt from development whilst a large majority of respondents claimed to know 'little or nothing' about Green Belts.	Acknowledgement
REP1-100	CPRE Oxfordshire	Another key concern is the impact on agricultural land. Over 38% of the site is classified as Best and Most Versatile (BMV) farmland—though we believe this figure is underestimated, as parts of the land were excluded from the ALC survey without clear justification. CPRE Oxfordshire maintains that the applicant has not adequately shown how the development avoids or minimises harm to BMV land. This area has a history of high-yielding crops, with neighbouring farmers reporting wheat yields of 8.5 tonnes per hectare—well above the national average. Describing it as 'low productivity' is inaccurate and dismissive of its proven value. There is an alternative, land farmed in a regenerative nature will improve soil structure and yields.	The Applicant is arranging access to survey the additional 67ha of land associated with the cable routing options. However, based on the soil types known to be present within these areas, the survey of these areas is unlikely to change the overall percentage of the BMV that is contained within the area of the Project. The ALC survey report has been produced by a soil surveyor with over 30 years experience in ALC survey and has been discussed with representatives from Natural England, in terms of methodology and the detailed survey results. There is no reference to "low productivity" in Volume 1, Chapter 17: Agricultural Land Use and Public Rights of Way [APP-054]	Agricultural Land Use
REP1-100	CPRE Oxfordshire	Finally, with regard to public rights of way, we are concerned that the project will significantly impact their use. The public's enjoyment of these routes is likely to be diminished by the presence of solar panels, fencing, and dense hedgerows intended to screen the development, all of which will create an enclosed and visually intrusive environment.	Please refer to the Applicant's response to REP1-081 in [EN010147/APP/12.4] It is also acknowledged that the proposed mitigation planting would result in a change in views available within the landscape. The proposed landscape mitigation occasionally acting as a partial screen, channelling views and impeding open aspects, these effects would only occur within a short section of routes, with typically wider views. However, with the undulating nature of topography and suitable widths for PRoW corridors, views of the wider landscape and key features such as church spires, distinctive landforms (including Burleigh Wood) would remain open and available to visual receptors. The beneficial effects to landscape character assist in balancing any intermittent adverse effects experienced by visual receptors	Landscape and Visual Impacts
REP1-100	CPRE Oxfordshire	Our main concern is the excessive scale of the proposed development and its potential to significantly alter the rural character of the area. Combined with new housing, it risks transforming a largely agricultural landscape into an industrial one. Additionally, the visual impact on visitors approaching Blenheim and Woodstock via the A44, from Oxford, appears to have been completely overlooked.	Please refer to the Applicant's response to REP1-081 in [EN010147/APP/12.4] , and response to Question 1.14.10 of the ExA's First Written Questions. The project would potentially be perceivable in transient and oblique views within a limited section from the A44 closer to Oxford Airport, which is approx. 2.4 km from Blenheim.	Landscape and Visual Impacts
REP1-100	CPRE Oxfordshire	Turning to Oxford Green Belt in 2024, CPRE commissioned a survey on the Oxford Green Belt, which revealed that 80% of respondents believe it should remain open and free from development as required by the NPPF. Public opinion is strongly in favour of protecting this vital landscape. The Green Belt serves as the countryside next door for 165,000 Oxford residents, and its loss to development would represent a serious disservice to the community and a lasting impact on the character of the area.	The Applicant notes CPRE's comments and concerns. However, on balance, the Applicant is of the firm view that in this case Very Special Circumstances exist that outweigh any harm caused. The Applicant would also add that the Green Belt would not be lost, it will persist, as will the agricultural use of the land underneath and around the solar arrays. Access to the area will also increase with new paths/cycleways created. The need for this form of development is clearly established in Government policy (see for example [PDB-0140]).	Green Belt

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-101	Forever Fields	Forever Fields book - Any post-hearing submissions requested by the ExA.	The Applicant notes the submission of the Forever Fields book into the examination, as requested by the ExA.	Acknowledgement
REP1-102	Forever Fields	Written summaries of oral submissions given at the Hearings during the week commencing 12 May 2025	The Applicant notes the Written Summary of the oral submission as presented by Forever Fields to the ExA at the Open Floor Hearing.	Acknowledgement
REP1-105	Low Carbon Hub	<p>Community benefit fund~:</p> <ul style="list-style-type: none"> Our petition asks for 2% of project revenue to be allocated to communities. A conservative estimate tells us that 2% would create approximately £840k in community benefit, more than the £200,000 currently on offer. We believe funds should be tied to the performance of the project not a one-off payment so that if the project does well, the communities also benefit. We propose that a separate fund be set up and managed by an independent board made up of key stakeholders, from the developer, landowner, local authorities, and communities This funding could be game-changing in supporting people to decarbonize their homes, businesses and schools by enabling the difficult task of reducing energy demand, a key factor in tackling climate change. A properly funded, long-term community benefit fund set up like this could make a real difference, creating significant social benefits and helping people out of fuel poverty. A community benefit model here could also set the national standard for what's to come as there are more large-scale projects such as this in planning. <p>Getting the community benefit right means people could really benefit from the transition to the zero-carbon energy system we need. And crucially it will help ensure that no one is left behind in that transition.</p>	<p>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.</p> <p>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.</p>	Community Benefits and Impacts
REP1-107	Oxford Aviation Services Limited	<p>1 The runway is used in both directions - its use depends on the prevailing winds.</p> <p>2 Regardless of direction of take-off or landing, overflight of the proposed development is necessary due to approach and take-off paths.</p> <p>3 There may be other airports that may have solar panels under flight paths, however the context at Oxford is very different, the majority of aircraft are light aircraft, including single engine. In the event of engine failure they would be forced to land in the fields immediately underneath the approach, in which solar panels are proposed. Often these aircraft are in the hands of trainee pilots</p> <p>4 In the event of an engine failure they will have no option but to land in an off aerodrome location. If that forced landing is into a solar array, the chances of survival are likely nil.</p> <p>5 Last year, such an engine failure occurred immediately after take off. The instructor took had been in place as planned, they would have landed into the back of solar panels, with almost certainly a fatal outcome.</p> <p>6 The Airport is not ideologically opposed to the development. However the increased risk posed by the development is not acceptable. The Airport has a duty of care to its tenants, which includes flight training organisations.</p> <p>7 The written submission showed the area of land which the Airport believes should be removed from the scheme. This remains the principal issue for the Airport.</p> <p>8 The Airport also highlighted concerns with the developments potential to attract more birds and other wildlife to the site, through new green infrastructure and the effect of the solar panels appearing as waterbodies. There are also concerns with the displacement of wildlife from the existing open land. The Airport already invests significant financial resources in deterring wildlife from the airfield.</p> <p>9 The issue of lake effect as a result of solar arrays warrants further consideration. Waterbodies attract larger bird species which can be extremely dangerous for jet aircraft, such as the larger business jets that use Oxford Airport.</p> <p>10 The Airport also registered concerns about potential for thermal plume, both in respect of the attractiveness to larger birds, soaring across using rising air currents and through turbulence effecting lighter aircraft. Turbulence is potential an issue for inexperienced pilots. The Airport also has concerns about thermal plume distorting primary radar returns, leading to inaccurate or partial radar picture.</p> <p>11 Glint and glare may also be an issue, particularly given the recent experience at Amsterdam, which has been forced to close one of its runways for two hours a day due to glare from a recent solar installation.</p> <p>12 Oxford Airport has been one of the UK's pre-eminent training airport's since 1932, and whilst not ideologically opposed to the development, there is a need to protect the safety</p>	<p>1 The runway is used in both directions - its use depends on the prevailing winds.</p> <p>Noted.</p> <p>2 Regardless of direction of take-off or landing, overflight of the proposed development is necessary due to approach and take-off paths.</p> <p>Noted.</p> <p>Points 3 – 5, 7 – 8, 10 - 11 are being discussed as part of the the Applicant's Statement of Common Ground with Oxford Airport.</p> <p>6 The Airport is not ideologically opposed to the development. However the increased risk posed by the development is not acceptable. The Airport has a duty of care to its tenants, which includes flight training organisations.</p> <p>Noted.</p> <p>9 The issue of lake effect as a result of solar arrays warrants further consideration. Waterbodies attract larger bird species which can be extremely dangerous for jet aircraft, such as the larger business jets that use Oxford Airport.</p> <p>A lake effect and larger bird species was discussed with the Airport and was subsequently removed from the "Further Written Statement" summarized in REP1-108</p> <p>12 Oxford Airport has been one of the UK's pre-eminent training airport's since 1932, and whilst not ideologically opposed to the development, there is a need to protect the safety of the Airport's customers and tenants and with it the viability of the business. If built as proposed, the Airport would probably have to close to flight training, as the risk to life would be too great.</p> <p>Noted.</p> <p>13 explained that he has himself once had to make an emergency off aerodrome landing, explaining that instinct take over and you automatically look for the nearest safe place to come down. In most cases, at Oxford, you have very inexperienced pilots who may not have the instincts an experienced pilot may have and will therefore require a reasonable expanse of open land upon which to alight. Clearly a solar array presents an exceptional level of hazard.</p> <p>Noted.</p>	Aviation

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>of the Airport's customers and tenants and with it the viability of the business. If built as proposed, the Airport would probably have to close to flight training, as the risk to life would be too great.</p> <p>13 explained that he has himself once had to make an emergency off aerodrome landing, explaining that instinct take over and you automatically look for the nearest safe place to come down. In most cases, at Oxford, you have very inexperienced pilots who may not have the instincts an experienced pilot may have and will therefore require a reasonable expanse of open land upon which to alight. Clearly a solar array presents an exceptional level of hazard.</p>		
REP1-107	Oxford Aviation Services Limited	<p>1, The issues raised point to a lack of evidence submitted in support of the application. In many respects this links to the scoping out of Major Accidents and Disasters from the ES Statement.</p> <p>2 It seems as though the EIA Scoping submission did not give these matters due regard, which led to a decision being made by the Inspectors to accept the scoping out of the chapter. As a result, appropriate reporting has not been carried out, this is despite the Inspectors scoping opinion (AP126) specifically asking that the submission ensures that the operations and safety of Oxford Airport is not compromised.</p> <p>3 The Ecology ES Chapter, for example, notes the potential for displacement of ecology during construction, operation and decommissioning – however there is no further analysis of the effects.</p> <p>4 The Airport as asking for the analysis to be done, so informed decisions can be made.</p>	The SoCG will contain comments and further reporting to address these issues.	Aviation
REP1-112	Southill Community Energy	<p>3. PVDP has proposed a contribution to community benefit from Botley West at a level of £300-500/MW.</p> <p>4. For information, Southill Community Energy, which started generation in 2017, is required by its S106 conditions, to provide a minimum of £10k/MW each year - that is, £45,000. £15k goes to Cotswold National Landscape and a minimum of £30k goes to the related charity, Sustainable Charlbury, to distribute to local projects. 5. Sustainable Charlbury has granted funds to almost all the community buildings in Charlbury, including the school, to make them as low energy and low carbon as possible. It has supported community halls in other communities. It has also funded food, nature recovery and education projects. Between them, the two organisations have donated almost £300k of community benefit since 2017.</p> <p>6. £45k is roughly equivalent to 1% of our income and is a minimum. The level of community benefit is likely to increase significantly over the next few years and could more than double. 7. It's hard to calculate the income of Botley West, but estimates range from £50m-£100m year.</p> <p>8. If it was required to pay 1-2% of its income to community benefit, this would amount to £500k - £1m/year or twice that.</p> <p>9. A sum of this magnitude could benefit local communities. But it could be used strategically to benefit Oxfordshire as a whole. A fund to develop quality retrofit training for excellent energy and carbon performance for all buildings in Oxfordshire could transform the skills of the local buildings industry. The fund could be managed by a vehicle set up for this purpose, to be run by a group of existing grant-giving bodies working with, for example, Abingdon & Witney College.</p>	<p>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.</p> <p>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.</p>	Community_Benefits_and_Impacts
REP1-114	Stop Botley West	<p>Socioeconomics</p> <p>3.3.1 Volume 1, Chapter 15 of the ES considers Socioeconomics [EN10147/APP/6.4]. Figure 15.2 identifies the Tourism Study Area and a PRoW map identified in a 2km radius from the Site.</p> <p>This figure shows Blenheim Palace via a singular point rather than illustrating its extensive grounds, which are publicly accessible and is therefore misleading.</p>	Noted.	Socio economics
REP1-114	Stop Botley West	<p>3.3.2 The ES chapter considers impacts to the visitor economy across the construction, operation and decommissioning phases. Paragraph 15.9.142 states that landscape is an important part of the tourism offer in the area and, as such, any changes to the natural landscape could impact significantly on its appeal. It is also stated that tourism contributes significantly to the local economy and that walking and cycling are a popular tourist activity in the locale. Despite this assessment, the sensitivity of landscape in terms of the visitor economy is only considered to be medium, which appears to be based almost exclusively on the public footpaths around the Site itself and the conclusion that these are not well-used. There is no cross-reference to the significance of landscape effects (albeit</p>	The value (sensitivity) of any receptor is evaluated based on a variety of inputs. For a receptor that is multi-faceted e.g. visitor economy, different aspects of the visitor economy are evaluated to create one singular sensitivity. As stated, there was no sufficient need to reference landscape effects as they were generally insignificant. Sensitivities are ultimately guided by professional judgement and a medium sensitivity for the visitor economy is deemed reasonable.	Socio economics

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		these are significantly understated) considered in the relevant chapter of the ES or other receptors.		
REP1-114	Stop Botley West	3.3.3 Paragraph 1.9.150 states that any impacts on the visitor economy at operational stage would relate to the effect on the visual change in the landscape from agricultural fields to fields with ground mounted solar arrays. Whilst it is agreed this would be the main impact pathway, there is no further substantive assessment of this matter, even though the Project would clearly affect the experience of visitors to Blenheim Palace. As set out in further detail below, the landscape, visual and historic environment impacts upon Blenheim Palace and its environs have been significantly understated within the ES and as a result, the Chapter 15 cannot adequately assess the impact of the Project to Blenheim Place as significant draw of visitors to the area.	The Socio Economics ES Chapter [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption and loss of visitor numbers, particularly during construction however the overall significance of effect across all phases is not significant. Furthermore, a Heritage Impact Assessment [APP-141] has been undertaken to review the potential for the Project to harm the significance of Blenheim Palace as a World Heritage Site (WHS). This has found that the construction, and decommissioning of the proposed Botley West Solar Farm would result in a minor negative impact on one of the defined attributes which contribute towards the Outstanding Universal Value of the WHS.	Socio economics
REP1-114	Stop Botley West	3.3.4 The attractiveness of the landscape, the value of the visitor economy, the significant impact upon landscape/visual respects by virtue of the Project, and the ES's own findings in this respect, indicate there would be a significant impact upon the visitor economy by virtue of the diminished and urbanised character of the area post-development.	The potential impacts of the Project upon all 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] and they were deemed "Minor Adverse" (not significant) across all phases of development.	Socio economics
REP1-114	Stop Botley West	Public Rights of Way (PRoWs) 3.4.19 NPS EN-3 sets out that the Secretary of State should assess the potential impact from glint and glare on nearby homes, motorists, public rights of way and aviation. The submitted Glint and Glare Study [EN010147/APP/6.5] considers impact on road traffic safety only but there is no wider consideration of visual receptors in this study or the LVIA.	The Glint and Glare Assessment assesses the potential impact upon aviation safety, road safety, residential amenity and railway operations. Impacts upon public rights of way are considered to be 'low impact' in the worst case, due to there being no safety concerns and any impact upon amenity would be fleeting as users of PRoW pass through the affected area.	Glint and Glare
REP1-114	Stop Botley West	3.7 Residential Amenity 3.7.1 Paragraph 2.10.27 of the Planning Supporting Statement recognises that national policy in respect utility-scale solar identifies two principal areas of impact to residential amenity. Firstly, in relation to visual amenity and secondly, in relation to glint and glare. It is stated in the Planning Supporting Statement these matters are considered in the Landscape and Visual chapters of the ES, but this is not the case. A Glint and Glare Study [EN010147/APP/6.5] is included as Appendix 4.4 to the ES sets out that solar reflections are geometrically possible to 632 of the 699 dwellings assessed. Table 7.4.2 contains discussion of impacts but in most cases relies on "existing and/or proposed vegetation" to reach the conclusion that there is no impact or mitigation required. 3.7.2 Firstly, if proposed vegetation is relied upon to screen the impacts of glint and glare then mitigation is clearly required for more than just the receptors identified in the Table as expressly requiring some sort of additional screening. Secondly, the mitigation measures proposed are vague and lack specificity regarding implementation, effectiveness and maintenance. Where detailed mitigation measures are discussed, it is only vaguely described as a "vegetation or a fence" without any clear specifications on height, density, placement or future maintenance. It is therefore unclear how the recommendations of the Glint and Glare study have been transposed into the landscape design of the Project. For example, there is no detailed implementation plan to provide assurance of the mitigation's effectiveness nor consideration of the fact that proposed vegetation would clearly take some time to mature. 3.7.3 Despite the content of the Planning Supporting Statement, Chapter 8 of the Environmental primarily focuses on broader landscape and visual impacts rather than specifically addressing residential amenity. Whilst the LVIA includes assessments of visual effects from various representative viewpoints, it does not provide a detailed analysis of how the proposed development might directly impact the living conditions of nearby residents, such as potential issues related to glint and glare or changes in visual amenity from private properties. 3.7.4 The lack of a focused evaluation on residential receptors means that potential adverse effects on local inhabitants may not have been fully considered or mitigated. This prevents readers from obtaining a comprehensive understanding of the project's potential impacts on local communities.	No specific national guidance exists which establishes a methodology for assessing glint and glare. In the absence of this, Pager Power reviewed more general existing planning guidelines and the available studies in the process of defining its own glint and glare assessment guidance and methodology. Page Power has been appointed by the Applicant as it has significant expertise in G&G assessments for NSIP scale solar developments. Pager Power's methodology for assessing impacts towards residential amenity is to consider whether solar reflections are geometrically possible, without consideration of screening, and the duration for which effects are possible. It is considered that existing and proposed vegetation screening is sufficient to mitigate solar reflections towards residential dwellings, in line with industry-standard practices. As impacts upon dwellings relate to amenity, rather than safety, and some glare is considered acceptable (below the reference thresholds of 3 months per year and 60 minutes on any given day), it is typically not required that proposed vegetation is fully mature before solar panels are installed. The mitigation recommended within the Glint and Glare Assessment has been implemented within the design of the project and all vegetation required to screen views towards residential dwellings will be grown to a height and density sufficient to significantly obstruct views of the solar panels.	Glint and Glare
REP1-114	Stop Botley West	3.8 Flood Risk 3.8.1 Paragraph 5.8.21 of NPS-EN1 sets out that the Sequential Test ensures a sequential, riskbased approach is followed to steer development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites within medium risk areas and then, only where there are no reasonably available sites in low or medium risk areas, within high-risk areas.	The sequential approach was applied to steer development away from higher flood risk areas where reasonably practicable, and where development occurs in flood risk areas, the Exception Test and appropriate mitigation have been applied as necessary. The Site Location balances multiple considerations, including environmental constraints, land ownership, biodiversity, heritage, and landscape impact alongside flood risk. This was considered as part of the site selection process, detailed in 6.2.3 Environmental Statement Chapter 3 Alternatives and Design Iteration [APP-026] .	Hydrology and Flood risk

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>That approach to the Sequential Test is also reflected in development plan policy as well as the National Planning Policy Framework.</p> <p>3.8.2 Section 6.2 of the Flood Risk Assessment claims that the Sequential Test is passed at both a strategic level and a site-level. However, Chapter 10 of the ES dealing with hydrology and flood risk makes numerous references to features being within areas of surface water flood risk on the Site. A review of the Development Areas Plan against the recently updated Environment Agency Surface Water Flood Maps indicates numerous areas of operational development within areas of surface water flood risk. Most notably these include:</p> <ul style="list-style-type: none"> • Southwest of Bladon Heath stretching down Burleigh Road to the railway line, particularly to the north east of the railway line; • East of Pinsley Wood and West of Lower Road near Church Hanborough • Between Bladon Heath to the East and Begbroke; • North of Cassington; and • Various patches of surface water flood risk to the east of Wootton <p>3.8.3 It is not clear from the application material how these areas would be dealt with or why they cannot be avoided at the very least within the Site. As such, there is insufficient evidence that the sequential approach to flood risk has been followed and the Project falls into conflict with NPS-EN1.</p>	<p>We note there are limited areas where development is proposed in locations at risk of surface water flooding. Avoidance of all surface water flood risk areas within the site boundary is not feasible without compromising other critical project objectives or causing greater overall impacts. However, it has been demonstrated through 6.5 ES - Appendix 10.1 Flood Risk Assessment [APP-166] that the inherent design of the solar panels will place them above the surface water flood depths.</p>	
REP1-114	Stop Botley West	<p>3.5.1 The review of the application, in addition to Marrons' own assessments, make it abundantly clear that the heritage sensitivities associated with the Project are extremely high, complex and often overlap with numerous assets as well as other environmental considerations. In untangling these to understand the effects of the Project the historic environment, it is apparent that in many instances it is the collective significance of these heritage assets not just their individual heritage values that would be affected.</p>	<p>The Applicant notes this comment.</p> <p>With regard to the likely impacts on the OUV of the Blenheim Palace WHS, the Applicant has presented their assessment 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 (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), 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'.</p> <p>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.</p> <p>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.</p>	Historic Environment
REP1-114	Stop Botley West	<p>3.5.2 We agree with the Applicant that heritage assets of the highest, international significance have the potential to be affected by the Project in relation to the Blenheim Palace World Heritage Site (WHS) and those heritage assets associated with it. But alongside these are numerous other heritage assets across all grades and types of designation that also require consideration to appropriately manage changes within their settings. Together, these heritage assets contribute to the narrative of the shaping and character of this area of Oxfordshire over centuries and are consequently valued not just for their intrinsic heritage significance but their shared importance.</p>	<p>The Applicant notes this comment.</p> <p>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.</p>	Historic Environment
REP1-114	Stop Botley West	<p>3.5.3 National and local policy includes a number of requirements in respect of the historic environment. In addition to the need to identify potentially affected heritage assets and assess their significance and any contribution to this from their setting, emphasis is placed on mitigation with the need to give consideration to steps that can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting [NPS EN-3 Paragraph 2.10.117]. The importance of applicants taking account of the results of historic environment assessments in their design proposals is also required [NPS EN-3 Paragraph 2.10.116]. Additionally, the need to take into account possible impacts,</p>	<p>The Applicant notes the comment regarding the policy requirement to identify potentially affected heritage assets and assess their significance and any contribution to this from their setting. This has been set out in the Applicant's submitted documents, most recently in the Revision 1 version of the Settings Assessment [EN010147/APP/6.5] submitted at Deadline 2.</p> <p>The Applicant notes the comment regarding the policy requirement for emphasis to be placed on mitigation with the need to give consideration to steps that can be taken to ensure heritage assets are conserved in a manner appropriate to their significance. Mitigation 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</p>	Historic Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		including cumulative, on the wider historic environment is a further consideration [NPS EN-1 Paragraph 5.9.9].	design set out in Change Request Notification 2 which the Applicant intends to submit at Deadline 2. Policy also accepts that harm to the significance of heritage assets can occur when Nationally Significant Infrastructure Projects are brought forward. The tests in which this harm is weighed against public benefits are set out in paragraphs 5.9.31 to 5.9.32 of NPS EN-1. Paragraph 2.3.8 of NPS EN-3 establishes that large-scale renewable energy projects bring substantial public benefits through the mitigation of climate change.	
REP1-114	Stop Botley West	3.5.4 SBW considers the approach to the Project is not adequately heritage-led as it fails to address, understand and therefore consequently appropriately mitigate setting impacts on numerous heritage assets. Additionally, in some instances, the mitigation proposed would itself be inherently harmful. As heritage assets of up to the highest international significance would be affected, it follows that mitigation measures should be correspondingly sensitive and respectful. With regard to archaeological remains, where areas of the Site containing significant non-designated buried remains are identified these would be avoided by the permanent developable footprint [Table 7.14 in ES Chapter 7: Historic Environment]. In this respect, as made clear from the Application, where setting impacts have the potential to harm the significance of aboveground heritage assets of equal and in many cases much higher significance, they are not afforded a similar approach.	<p>The Applicant respectfully disagrees with the comment that the Project is not adequately heritage-led. There are 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.</p> <p>The proposed mitigation measures have been carefully considered within the design process, and seek to balance the reduction of landscape and visual impacts against the potential for increases in impacts on heritage assets and the overall historic environment.</p>	Historic Environment
REP1-114	Stop Botley West	3.5.5 The proposed scale of the Project and its relationship with heritage assets means that some impacts on heritage assets would be unavoidable. However, it is our view that the Applicant consistently understates the impact of the scheme on the WHS and associated heritage assets. Not only are the links between Blenheim with the traditional English countryside and villages surrounding it inscribed in its Outstanding Universal Value (OUV) as Attribute 7, but there is a wealth of further analysis clearly identifying the contribution of different elements of the WHS's setting. The Project is non-compliant with multiple aspects of the WHS Management Plan and in particular, measures for the protection of its historic farmland setting. The Applicant also acknowledges that the Site contains areas of medium sensitivity in a Sensitivity Heat Map (Figure 1.3 in ES Appendix 7.4) which would form part of the developable area. It is not clear what criteria was used to ascribe these sensitivities.	<p>The Applicant respectfully disagrees with the view that the significance of effects on heritage assets have been downplayed. 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.</p> <p>With regard to the likely impacts on the OUV of the Blenheim Palace WHS, the Applicant has presented their assessment 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 (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England.</p>	Historic Environment
REP1-114	Stop Botley West	3.5.6 It is worth noting that there is no Buffer Zone to the WHS. The Operational Guidelines for the Implementation of the World Heritage Convention issued by UNESCO recognise the importance of the character of the wider landscape around WHSs and Operation Guidelines seek protection of the immediate setting of WHSs and 'of important views and other areas or attributes that are functionally important as a support' to the WHS. This is underpinned by UK planning guidance which supports this approach, stating that 'however it is intended to protect the setting, it will be essential to explain how this is to be done in the relevant development plan policies'. In respect of the Blenheim Palace WHS, the Management Plan identifies that existing protections to the landscape surrounding the WHS were deemed sufficient and that a Buffer Zone was not considered necessary. The Management Plan notes that the WHS is in the unusual position of being a WHS in single ownership with an unprecedented ability to conserve the OUV. On this basis and together with the existence of a robust, adopted management plan, and statutory and local plan protections, paragraph 2.11 of the Management Plan notes that: '... it is clear that Blenheim Palace and park WHS is already provided with a very high degree of protection for the attributes that help convey the OUV of the site and thus an additional level of designated protection is unnecessary'.	<p>The Applicant recognises the absence of a defined Buffer Zone to the Blenheim Palace WHS. Not all UK World Heritage Sites have a Buffer Zone; some rely instead on a strong understanding of the site's significance and a robust WHS boundary such as the one at Blenheim Palace.</p> <p>It should be noted that the presence of a defined Buffer Zone for a World Heritage Site does not preclude development within that Buffer Zone (or indeed within the wider setting of the WHS) – it means that due consideration must be given to the impact of the development on the OUV of the WHS. This consideration is required through national planning policies, backed up where appropriate with local planning policies and management plans.</p>	Historic Environment
REP1-114	Stop Botley West	3.5.7 The conclusion of the Applicant is that the Project would result in a negligible adverse significance of effect on the WHS. The significance of effect on other receptors located within the WHS is also assessed as similarly being negligible adverse. As such, no significant effects in EIA terms are alleged to result to heritage assets at Blenheim from the Project; paragraph 7.5.7 of ES Chapter 7 states that effects categorised as Minor or less are not considered to be significant. The discussion of the need for a Buffer Zone to the WHS as summarised above reinforces the importance of the setting of the WHS and highlights that it was only deemed not to be required due to existing protections.	<p>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 (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England.</p> <p>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.</p>	Historic Environment

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			<p>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 <i>'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'</i>.</p>	
REP1-114	Stop Botley West	<p>3.5.8 As such, the Applicant's conclusion that no impacts would exceed negligible adverse is considered to result from an assessment which consistently undervalues the contribution of areas of the Site to the significance of these heritage assets. Therefore, the proposed mitigation measures are not considered to be based on a robust and holistic understanding of the nature and value of the Site's role as part of their settings. As stated by ICOMOS in their response to the PEIR, they do not agree that the 'overall character of the historic landscape' can be typified as generally low, and go on to say that such a typification cannot be supported when the landscape is seen part of the OUV of the WHS. Given the ascribed importance of the estate farmland setting to the WHS, the Project represents a threat to the loss of Blenheim Palace's WHS status.</p>	<p>The Applicant respectfully disagrees with the comment that <i>'the proposed mitigation measures are not considered to be based on a robust and holistic understanding of the nature and value of the Site's role as part of their settings'</i>. The Applicant considers that the proposed mitigation measures, including the embedded mitigation in the form of the project design as set out in the submission documents and any subsequent revised versions of such documents, is robust and accurate.</p> <p>The Applicant's notes the comment regarding the PEIR response from ICOMOS. This was acknowledged by the Applicant and was addressed within the ES:</p> <p><i>'Enclosure landscapes are common within most of Oxfordshire. Where the enclosed fields have been subject to reorganisation and boundary loss (as is the case with much of the land within the Site), the sensitivity/value of the character of the historic landscape would usually be considered to be low'.</i></p> <p><i>However, the historic landscape within the Northern Site Area and the Central Site Area forms part of the setting of the Blenheim Palace WHS. The enclosure of the land here was strongly linked to the strategies of land acquisition and disposal carried out by or on behalf of the dukes of Marlborough (additional information on this is provided within Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment of the ES). This association enhances the sensitivity/value of the character of the historic landscape in these areas, which is therefore considered to be medium.'</i> (paragraphs 7.9.75 and 7.9.76 of ES Chapter 7: Historic environment [CR1-003]).</p> <p>The Applicant is not aware of any comment from any of the key WHS stakeholders which would support the assertion by Stop Botley West that the WHS status of Blenheim Park is at risk. As set out above, ICOMOS-UK has confirmed that the scheme will not have a direct impact on the outstanding universal value of Blenheim Palace and Park WHS, nor on its setting, therefore any proposal to remove the WHS status seems highly unlikely. If Stop Botley West have any evidence to support this claim they should submit such evidence into the Examination.</p>	Historic Environment
REP1-114	Stop Botley West	<p>3.5.9 In addition to those heritage assets located at the WHS, it is also considered that the Applicant underplays the extent to which areas of the Site that are proposed to form part of the developable area make to the respective significance of other Listed Buildings and Conservation Areas as well as Scheduled Monuments. Consequently, the level of impact arising from the introduction of extensive areas of solar panels and/or substantial hedge planting is not accurately understood and therefore cannot inform effective mitigation measures. The heritage assets outside of the WHS that have been identified as being affected by the Project include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Roman villa (Sansom's Platt) (Scheduled Monument); • Church of St Peter & St Paul, Church Hanborough (Grade I Listed Building); • Burleigh Farmhouse (Grade II Listed Building); • Bladon Conservation Area; • Begbroke Conservation Area; • Woodstock Conservation Area; • Cassington Conservation Area; • Cumnor Conservation Area; and • Church Hanborough Conservation Area. 	<p>The Applicant respectfully disagrees with the view that the significance of effects on heritage assets has been downplayed. 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.</p>	Historic Environment
REP1-114	Stop Botley West	<p>3.5.10 From a review of Annex A of ES Appendix 7.5, the heritage assets scoped in or out for a detailed setting assessment is broadly accepted. However, the Applicant states throughout that no other designated heritage assets outside of the 2km search area were identified as meriting consideration (ES Chapter 7). As ascertained from our site visits, there is a clear – albeit distant – view of the iconic Oxford skyline from publicly accessible locations in the Central and Southern Areas of the Site. The foreground of these views would be changed through the introduction of solar panels and hedgerow planting as</p>	<p>The 2 km study area for the assessment of impacts arising from changes within the settings of heritage assets was established through consultation with relevant stakeholders, commencing with the Scoping stage of the Environmental Impact Assessment (EIA). As set out in paragraph 1.3.1 of ES Appendix 7.5: Settings Assessment [APP-142], designated heritage assets beyond 2 km were considered if they fell within the Zone of Theoretical</p>	Historic Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		currently proposed. Again, this omission in the heritage baseline means that the potential impacts on sensitive heritage assets located in Oxford have not been considered and therefore, effective mitigation has not been formulated as required.	<p>Visibility (ZTV) for the Project and had designed views towards the proposed development or a particular iconic status that could be affected by the proposed development.</p> <p>The city of Oxford was not identified by the Applicant as a heritage asset requiring detailed assessment, nor was it identified as such by any consultee or stakeholder during the consultation process. The Applicant acknowledges that the city is visible in views from certain parts of the Project Site. However, the historic core of the city is around 4.5 km from the nearest part of the Southern Site and around 7.5 km from the nearest part of the Central Site, and even further from any of the elevated locations within the Project Site from which the city is actually visible.</p> <p>In all of the views towards the city of Oxford from within the Project Site, other more recent developments are visible in front of the historic core. Depending on the location of the viewpoint, these include not just more recent residential areas but also major highways on raised embankments, the city airport, and major developments such as the Oxford Science Park. The addition of solar panels and hedgerow planting in the foreground of any view from within the Project Site towards the city of Oxford is unlikely to have any impact on the heritage significance of the Oxford Central (University and City) Conservation Area or any of the heritage assets within that Conservation Area.</p>	
REP1-114	Stop Botley West	3.5.11 On the basis of the above, it is clear that impacts on heritage assets of up to international significance are consistently understated, and the heritage baseline contains a number of omissions and inaccuracies in identifying and understanding all of the potentially affected heritage assets. As such, the formulation of effective and appropriate mitigation has not been incorporated into the Project. This is contrary to the requirements of the NPS as well as the methodology set out in accepted Historic England guidance. We will be providing detailed evidence during the Examination which demonstrates that heritage impacts associated with the Proposed Development are higher than those concluded by the Applicant and that the present mitigation measures are not sufficiently effective or proportionate to the assets' individual or collective significance.	The Applicant notes this comment.	Historic Environment
REP1-114	Stop Botley West	3.6 BMV & Agricultural Land 3.6.1 NPS EN-1 Indicates that Applicants should seek to minimise impacts on the Best and Most Versatile ("BMV") agricultural land and preferably use land in areas of poorer quality [paragraph5.11.12]. It further requires that the Secretary of State should ensure that applicants do not site their scheme on BMV land without justification. Where sites do incorporate BMV land, the Secretary of State should consider the economic and other benefits of that land.	<p>The economic effects of the Project are assessed in Volume 1; Chapter 15 Socio-economics, including the effects of the project on agricultural employment and production.</p> <p>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%).</p> <p>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.</p> <p>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.</p>	Agricultural Land Use
REP1-114	Stop Botley West	3.6.2 Chapter 17 of the ES: Agricultural Land Use and Public Rights of Way states that approximately 36.4% of the Site comprises BMV or a total of 490 hectares overall. As a result, the Project could result in the loss of a significant amount of the most valuable and productive agricultural land as both a proportion of the overall site area and in absolute terms. Whilst Chapter 5 of the ES dealing with reasonable alternatives sets out that where practicable the Project has avoided "permanent adverse effects" upon BMV land, there is no actual evidence of what measures have been taken or considered to accomplish this objective in terms of site design or selection beyond the Project's inherent temporary nature.	<p>Section 17.9 of Volume 1, Chapter 17 , Agricultural Land Use and Public Rights of Way (APP-054) identifies that the Project would lead to the loss of only approximately 5.5ha of BMV, which does not represent a significant permanent loss of this resource.</p> <p>As Natural England have identified in their relevant representation, <i>"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."</i></p> <p>An outline Soil Management Plan (SMP) (APP-233) to safeguard soil resources has been produced and a detailed SMP, based on the principles contained within the outline document will be produced in accordance within Requirement 11 within the draft DCO.</p>	Agricultural Land Use
REP1-114	Stop Botley West	3.6.3 Chapter 17 of the ES considers the potential environmental effects of the Project in respect of agricultural land, but neglects to set fully and clearly assess the effects during the Project's operation and maintenance phase. We could find no clear statement as to what proportion of BMV land would be unavailable for current farming activities during the Project's operational lifespan by virtue of installation of the arrays them themselves. A	The assessment of the change in the agricultural use of the site, BMV and farm holdings, is assessed during the construction phase, as this is the period during which the change in the agricultural use to a less intensive sheep grazing regime beneath the panels would occur.	Agricultural Land Use

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		review of the Planning Supporting Statement (paragraphs 3.3.83 to 3.3.91) confirms that this aspect has not been assessed. As a result, the decision-taker is unable to fully consider the impact on the economic and other benefits of the BMV land, which would be lost to its current productive arable use for a considerable period.	The economic impact of the Project on agricultural land and employment is included in Volume 1, Chapter 15 Socio-economics (APP-052)	
REP1-114	Stop Botley West	3.6.4 SBW contends that the loss of substantial areas of high quality and productive farmland for the operational period would effectively be permanent. Even if the land was brought back into use following the decommissioning of the Project, the soil condition cannot be predicted at that point given disturbances caused during construction, including the laying of cables.	As Natural England have identified in their relevant representation, <i>"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."</i> An outline Soil Management Plan(SMP) (APP-233) to safeguard soil resources has been produced and a detailed SMP, based on the principles contained within the outline document will be produced in accordance within Requirement 11 within the draft DCO.	Agricultural Land Use
REP1-114	Stop Botley West	3.6.5 Various components of the Application refer to the land between and under the arrays being used for the grazing of sheep. This is an agricultural activity of much lower intensity than what previously submitted on the Site – most of it being arable. In addition, paragraph 5.8.2 of ES Chapter 5 – Alternatives Considered states that to avoid adverse landscape impacts the panels across the Site would not be fixed above 2.3m compared to 2.5m previously, a height chosen specifically to allow sheep to graze under the panels. It is not clear whether the lower fixed height would offer the same benefits in terms of maintain agricultural activities.	The outline Landscape and Ecological Management Plan (APP-235) identifies that sheep will be grazed beneath the panels at a low intensity stocking rate. The oLEMP is secured by Requirement 6 of the draft DCO.	Agricultural Land Use
REP1-114	Stop Botley West	3.6.6 For the above reasons, SBW considers that the harm arising from the loss of BMV land from the Project is substantial and weights against the grant of consent in the planning balance.	Section 17.9 of Volume 1, Chapter 17, Agricultural Land Use and Public Rights of Way (APP-054) identifies that the Project would lead to the loss of only approximately 5.5ha of BMV, which does not represent a significant permanent loss of this resource.	Agricultural Land Use
REP1-114	Stop Botley West	Landscape and Visual Effects 2.2.1 The assessment methodology adopted, and thus the conclusions of that assessment, are systemically flawed, partly as a consequence of the failure to address, inter alia, four key issues raised by a solar farm of this scale and nature in this location: <ul style="list-style-type: none">Inadequate consideration of alternative sites;The realistic assessment of landscape sensitivity and the capacity to absorb development;The scale of the development proposed; andThe effects of "within-project" cumulative impacts arising from the repetitive nature of the development proposed. 2.2.2 The standard assessment method proposed, whilst applicable to a one off, stand alone, solar farm of say 9 hectares [e.g. the proposed solar farm adjacent to Woodstock Sewage Treatment Works] is inadequate to accurately reflect the magnitude of landscape and visual impacts arising from the cumulative loss equating to 100no x 9 hectare sites which currently comprise 151 historic individual and well managed fields interconnected across a mosaic of high value sensitive landscapes. 2.2.3 The carrying capacity of the proposed sites' landscape to accommodate a solar farm of this scale is inadequate, which would result in long term, severe landscape and visual impacts. 2.2.4 The strategic location of solar farms of national scale should focus upon areas of landscape character diametrically opposed to the high value, small scale, well managed, densely settled river valley landscapes which characterise the rural estate farmland setting to Blenheim Palace, i.e. large scale, flat landscapes sited in less populated areas, capable of accommodating substantial mixed, multilayer, indigenous woodland screen belts in order to effectively envelop consolidated sites and thereby, mitigate landscape, visual, recreational and biodiversity impacts. 2.2.5 The assertion that only 6 out of the 11 Landscape Character Area/ Types identified in previous landscape studies and which are affected by the Project, are judged to be of Medium /High Sensitivity is not an accurate representation of the value and sensitivity of the 3 proposed development sites landscape in 2025.	The <u>EIA Regulations</u> do not prescribe or define: <ul style="list-style-type: none">MethodologyCategories of effectsSignificance thresholds, i.e. when an effect is significant or not <u>The state of environmental impact assessment in the UK</u> (Institute of Environmental Management and Assessment, 2011) (IEMA 2011) explains that there is no legal requirement to follow a set approach – in fact it is common for certain topics not to follow a set approach. LVIA is not a scientific discipline – it deals with perceptual qualities and relies on professional judgement. IEMA 2011 notes that <i>"In reporting the EIA's findings, ESs often set out a generic methodology at the start of the document indicating that significance has been assessed using a standard matrix style approach, with magnitude on one axis and receptor sensitivity on the other" ... "Despite this, it remains relatively common for one or more ES chapters to use an alternative approach. This is not a legal concern, as there is no regulatory requirement to apply the same methodological approach to significance evaluation across an EIA"</i> (IEMA 2011, page 60, section 6.3). On determining the significance thresholds of effects IEMA 2011 notes that <i>"... the EIA regulations do not set out terms for evaluating whether the assessment's findings are significant or not"</i> (IEMA 2011, page 61, section 6.3). Note: The IEMA 2011 document above is referred to in GLVIA3, paragraph 3.32 and has not been superseded and the points made in it remain relevant. The <u>Guidelines for Landscape and Visual Impact Assessment: Third edition</u> (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) is the Landscape Institute's and IEMA's guidelines for LVIA. This guidance and the subsequent technical guidance notes published by the Landscape Institute for the basis for the methodology used at Botley West Solar Farm. The methodology tailored for the assessment of the Proposed Development is based on the GLVIA3 which recommends that an LVIA <i>"concentrates on principles and process"</i> and <i>"does not provide a detailed or formulaic recipe"</i> to assess effects, it being the <i>"responsibility of the</i>	Landscape and Visual Impacts

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		<p>2.2.6 The Site's landscape importance and exceptional sensitivity in their capacity as the setting for, and gateway to, the internationally significant assets of:</p> <ul style="list-style-type: none"> The historic City of Oxford The World Heritage Site of Blenheim Palace The Cotswolds National Landscape The historic market town of Woodstock The burial place of Winston Churchill at Bladon Numerous Listed Buildings and Conservation Areas <p>2.2.7 The LVIA identifies a proliferation of public rights of way throughout the northern, central and southern sites, whilst the assessment states that:</p> <p>"The sensitivity of the people using the local PRoW network for informal recreation is considered to be High because appreciation of the surrounding environment is a primary concern."</p> <p>2.2.8 It is, therefore, evident that the industrialisation of the undulating river valley landscape would result in severe, long term, adverse visual impacts, particularly during winter months, upon local residents and others walking, cycling, horse riding and cycling on the network of footpaths, bridleways and local roads which traverse the area, many of which would have open overviews of the solar panels. Again, this aspect does not appear to have been considered in terms of formulating the scheme design and the mitigation measures.</p> <p>2.2.9 Whilst the fragmented, elongated and irregular site boundaries within an undulating landform, maximise the exposure of solar arrays to overviews and underviews from adjoining roads, rights of way and housing.</p> <p>2.2.10 The assertion that:</p> <p>"...no residential properties have the potential to experience a degree of harm over and above substantial...."</p> <p>2.2.11 Is not supported by the following factors:</p> <p>The GLVIA defines residents at home as being of Very High Sensitivity</p> <ul style="list-style-type: none"> The Residential Visual Amenity Assessment [RVAA] 2019 guidelines state that: "...there are situations where the effect on the outlook/ visual amenity of a residential property is so great that it is not generally in the public interest to permit such conditions to occur where they do not exist before." The proximity of development to residential properties. The overwhelming scale and cumulative impact of multiple solar arrays in over 150 adjoining fields upon landscape character and visual amenity. The suffocating entrapment/ encircling of individual properties and whole settlements. The uncompromising form of development which is unsympathetic to the undulating landform. The omission of effective, year-round, mitigation. The subliminal awareness of the loss of countryside setting to individual properties and settlements. The loss of seasonal awareness as the crop cycle is lost. The severe impact upon residents' "...quality of life and well-being...." European Landscape Treaty 2004. 	<p><i>professional to ensure that the approach and methodology are appropriate to the task in hand</i>" (preface to GLVIA3, Roman numeral page x).</p> <p>On determining significance GLVIA3 explains that <i>"there are no hard and fast rules about what effects should be deemed 'significant'..."</i> (GLVIA3, paragraph 3.32). Paragraph 3.33 explains that <i>"It is not essential to establish a series of thresholds for different levels of significance of landscape and visual effects, provided it is made clear whether they are considered significant."</i></p> <p>Landscape Institute Technical Guidance Note-2024-01: Notes and Clarifications of Aspects of Guidelines for Landscape and Visual Impact Assessment: Third Edition (GLVIA3) (Landscape Institute, August 2024) (LITGN-2024-01) provides guidance on 'Moderate' significance of effects at 3(5) <i>"...moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not."</i></p> <p>The use of matrices is addressed at LITGN-2024-01 3(6) which explains that they <i>"can be useful as a means of illustrating to the reader how judgements are combined and can support and summarise narrative descriptive text (GLVIA3 paragraph 8.10) but they should not dictate judgements. LVIA is a means of documenting professional judgement, rather than a formulaic process."</i></p> <p><u>Project Position:</u> The methodology used to assess the landscape and visual effects of the Botley West Solar Farm follows the standard best practice guidance as set out in the GLVIA3 and subsequent technical guidance notes, published by the Landscape Institute.</p>	
REP1-114	Stop Botley West	<p>Landscape & Visual Impact</p> <p>Blenheim Palace</p> <p>3.4.1 It is set out in the ES Chapter 08- Landscape and Visual Impact Assessment ("LVIA") that receptors at Blenheim Palace are potentially sensitive to the proposals and that those visiting the site and using the open access land within the grounds are 'key visual receptors' who should be considered within the assessment. The Zone of Theoretical Visibility ("ZTV") shows that there is the potential for views from within the gardens of Blenheim Palace. It is acknowledged that Blenheim Palace is a Grade I Registered Park and Garden (RP+G) and World Heritage Site (WHS).</p> <p>Within the summary description of the listing, reference is made to the views out from the park towards Woodstock, Bladon and the surrounding and distant countryside.</p> <p>3.4.2 Despite the above, there are no representative views recorded from within the WHS/Registered Park and Garden. This is an oversight due to the reference to key views</p>	<p>The Project has been carefully designed to ensure that no part of the development would be visible in any of the defined key views out of the Blenheim Palace WHS, or indeed from any location within the WHS.</p> <p>The design of the Project also considered the visibility of the scheme when viewed by visitors approaching the Blenheim Palace World Heritage Site (WHS). Some fields directly adjacent to the approach routes were withdrawn from the scheme as a result. This is further described in the Applicant's assessment of likely impacts and effects in respect of the Blenheim Palace WHS which is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (<i>Guidance and Toolkit for Impact Assessment in a World Heritage context</i>), and the preparation of the report was carried out within an iterative process in consultation with Historic England.</p> <p>The Heritage Impact Assessment identified a likely 'minor negative' impact on one defined attribute (Attribute 7) which contributes towards the Outstanding Universal Value (OUV) of the Blenheim Palace WHS. This is Attribute 7, which states <i>'The park retains a complete, 18th</i></p>	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>within the Historic England listing referred to above, the description of key views in the 2017 Management Plan (see Appendix 2) and the acknowledgement that it is a location for 'key receptors' in the LVIA. In addition, the roof of Blenheim Palace would be open to the public in Spring 2025 which will offer "breathtaking and wide-ranging views" of the countryside around Blenheim from which the Project will clearly be visible.</p>	<p><i>century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it</i>.</p> <p>The overall assessment of likely impacts and effects on the historic environment is presented within ES Chapter 7: Historic environment [CR1-003]. The likely impact on the Blenheim Palace WHS is set out at 7.9.52 – 7.9.56 of that chapter. The magnitude of impact on the heritage significance of the WHS has been assessed as 'negligible adverse', based on the 'minor negative' impact on a single attribute of the OUV as identified in the Heritage Impact Assessment (ES Appendix 7.4, [APP-141]). The impact would be time-limited and fully reversible. The sensitivity/value of the WHS is determined as 'very high', resulting in a likely effect of 'minor adverse' significance, which is not significant in EIA terms.</p> <p>The Applicant notes that in their Relevant Representation [RR-0398], 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.</p> <p>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.</p> <p>ICOMOS-UK state that <i>'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'</i>. (emphasis added)</p>	
REP1-114	Stop Botley West	<p>Cotswold Area National Landscape (CNL)</p> <p>3.4.3 The effects of the proposed development on the Cotswold Area National Landscape2 (CNL) are considered without any reference to the Special Qualities as set out in the Management Plan particularly with reference to views into and out from the CNL and the setting of the CNL itself.</p> <p>Although the proposals fall outside of the National Designation, they are in such close proximity (some 300m at the southern point in Bladon) that there should be detailed consideration of the potential indirect impacts on the surrounding landscape which contributes to the setting.</p> <p>Overall, the sensitivity of the landscape setting of the WHS and the Cotswold National Landscape have not been fully considered particularly regarding the value and susceptibility attributed to the landscape, recognising the contribution to the WHS and the CNL.</p>	<p>As stated in REP-114, the Project is not located within the Cotswolds National Landscape. As such, there would no direct impacts on the special qualities of the National Landscape, as detailed within the Cotswolds National Landscape Management Plan 2025-2030.</p> <p>The ZTV [APP-085] has indicated very limited potential intervisibility of the Project, around Combe to the west of Bladon. As such here would be very limited potential for any indirect effects upon the special qualities of the National Landscape, as detailed within the Cotswolds National Landscape Management Plan 2025-2030.</p> <p>Overall, the magnitude of the impact on the qualifying special qualities of the Cotswolds National Landscape during construction and operation is negligible and the sensitivity of the receptor is high. The effects, present for the duration of the Projects' operation, will be negligible to minor adverse, at both winter Year 1 and summer Year 15, which is not significant.</p>	Landscape and Visual Impacts
REP1-114	Stop Botley West	<p>Views Towards Oxford</p> <p>3.4.4 Views towards Oxford from the surrounding countryside are valued. Policy was introduced in the 1960s and reinforced in 2015 through the 'Assessment of the Oxford View Cones'. The Project doesn't lie within a view cone, however the identified view cones do not represent an exhaustive list of viewing points that provide important views of Oxfords skyline and there are longer views available towards Oxford from within the study area. There is no narrative about the potential impacts of the development on the experience of the views of Oxford from within the study area.</p>	<p>Due to the low-lying nature of the main built elements of the Project (solar arrays), at a maximum height of 2.3 m, and with the Project largely following the natural contours of the landscape, no part of it would break the skyline. Therefore, long distance views towards Oxford would remain available from higher ground. It is acknowledged that these views would be interrupted by the Project, but it is considered that the inherent character of distant panoramic views would remain, within which built elements such as large overhead power lines and other development is commonplace</p>	Landscape and Visual Impacts
REP1-114	Stop Botley West	<p>Impact on Landscape Character</p> <p>3.4.5 Overall, the LVIA understates the potential impact on landscape character. The potential for areas of the landscape within the study area to accommodate solar array is limited due to the large potential for adverse effects on a highly valued and particularly scenic landscape. Parts of this landscape have physical, perceptual and experiential links to the most valued landscapes. The proposal and the approach to mitigation are not landscape-led and in some instances the mitigation proposed fundamentally changes the character of the landscape, to the detriment of key features.</p> <p>3.4.6 We draw attention to the Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire dated October 2016 by LDA Design. This states within the Eastern Parks and Valleys Character Area that the potential to accommodate both</p>	<p>The impacts of the Project will be minimised by a comprehensive designed-in landscape mitigation scheme. As shown on the Illustrative Masterplan [APP-062], Landscape, Ecology and Amenities Plan [APP-228] and Outline Landscape and Ecology Management Plan [APP-235].</p> <p>All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once proposed planting has matured.</p>	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>solar farms and turbines is very limited within this character area due to the large potential for adverse effects on a highly valued and particularly scenic landscape. If developments are proposed then smaller schemes located in the Limestone Wolds character type and away from the highly susceptible Valleys and Parkland types are likely to result in the lowest potential for adverse effects. 3.4.7 Of the Eynsham Vale character area it states that the proximity to the Blenheim World Heritage Site could pose a particular constraint. Careful siting and design of schemes within this area are likely to be key to avoiding potentially unacceptable adverse effects and consideration of potential screen planting may be particularly important. The potential for the landscape to accommodate several developments before cumulative effects result in unacceptable change is likely to be limited.</p>	<p>Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass. Wider green corridors are also characteristic of the existing landscape, e.g., much of Dornford Lane (PRoW 416/11/30) which passes through the middle of the northern section of the Project.</p> <p>It is intended that the proposed landscape mitigation would be retained, post-decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, at the same time improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW corridors, views of the wider landscape and key features such as church spires would remain open and available to visual receptors.</p> <p>The retention of proposed designed-in landscape mitigation would enhance the key characteristics of host landscape character areas and be in line with recommended guidelines and enhancements priorities. For example, LCA 4: Estate Parks and Farmlands, which covers much of the northern section of the Project, has the following priorities which the Project and proposed landscape mitigation takes account of and reinforces:</p> <ul style="list-style-type: none"> • <i>retain mature boundary and roadside trees and replant as necessary;</i> • <i>manage and extend existing areas of woodland to maximise their wildlife and landscape value;</i> • <i>plant new blocks and belts of broadleaved woodland within estate farmland to reinforce typically enclosed, well-wooded character.</i> (Page 35, West Oxfordshire Landscape Assessment 1998). <p>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.</p> <p>Planting that would alter the baseline views, particularly at Year 15, but also forms part of a baseline scenario are large areas of woodland planting being undertaken, much of it within the Blenheim Estate, in areas close to the Project. Areas of these new woodlands are shown on the Illustrative Masterplan [APP-062] and can be seen in many of the baseline views, such as Representative Viewpoint 10 [APP-065 and 066]. Where visible, the new woodland has been factored into the LVIA assessment of effects and it has been assumed that, like the proposed mitigation, this woodland would be established at summer Year 15 and so further minimise potential effects.</p>	
REP1-114	Stop Botley West	<p>Representative Viewpoints & Visual Amenity</p> <p>3.4.8 Representative views have been recorded across the study area and generally consider the relevant receptor's locations. However there are some locations and receptors where views have been recorded in less-than-optimal locations, for example between Bladon and Begbroke where the views recorded are not truly representative of the experience of those visual receptors, particularly in more sensitive landscapes, where views are sequential or transitional along public routes. Additionally, some visual receptors such as rail users have been excluded from the assessment with no explanation.</p> <p>3.4.9 Of the 50 representative views recorded, only 31 have been visualised as AVR3visualisations and there is no explanation for those selected. SBW consider that some of the views which have the most value to local people and represent a clear understanding of the local landscape character and the visual experience have not been rendered as a visualisation, for example Viewpoint 24. As previously set out, there are no representative views recorded from the RP+G.</p> <p>3.4.10 Overall, the potential impacts on visual amenity are underestimated, particularly at Year 15, when mitigation planting has matured. Although the mitigation limits views of the proposals in many instances, this designed in mitigation alters the whole experience for the user of these routes. The LVIA lacks consideration of the value and intended experience from locations within the study area such as the approach to Bladon by road and public routes. The LVIA appears to find that simply reducing views of the proposal renders the impacts less than significant</p>	<p>Please refer to the Applicant's response to REP1-092 in [EN010147/APP/12.4] in respect of representative viewpoints and photomontages.</p>	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-114	Stop Botley West	<p>Methodology</p> <p>3.4.11 In August 2024 the Landscape Institute provided additional guidance on the 'Guidance on Landscape and Visual Impact Assessments' (GLVIA3) by way of Technical Guidance Note LITGN2024-013 The LVIA does not consider the overlap of heritage and ecology in accordance with this updated guidance. It is agreed that this is a separate specialist topic in ES terms however there are overlaps which are important to consider where relevant. It is also stated in the ES chapter that Green Belt is not specifically a matter for the LVIA (Page 23), however, this is contrary to guidance which sets out that where openness may be one of the aesthetic and perceptual qualities of the landscape it should be documented and addressed through the LVIA.</p> <p>3.4.12 For the purposes of this assessment, it is set out that any effects with a significance level of Moderate or less are not considered to be 'significant' in terms of the EIA Regulations.</p> <p>However, guidance sets out that this decision should be justified in the methodology or receptor assessment. The assessment of significance is also judged before and after mitigation which allows the assessor to seek to reach a reduction in significance (pre mitigation a significant impact, post mitigation and not significant effect). This is not a recommended process. The mitigation is designed into the scheme and an inherent part of the overall proposals, and therefore the significance should not be judged without it in place.</p> <p>3 Notes and Clarifications on Aspects of Guidance for Landscape and Visual Impact Assessment Third Addition (GLVIA3)3.4.13 It is set out that the impacts of the cable corridors are discussed at Construction Phase only, however, this section is not included.</p> <p>3.4.14 The minimum buffer to residential receptors and properties is 25m and there is no justification for the selection of this distance. 25m is a very limited distance for a project of this nature and there are numerous examples where buffer zones have been provided of materially more than 25m.</p> <p>3.4.15 A Residential Amenity Assessment has not been carried out. This is considered in further detail below.</p> <p>3.4.16 Overall, the tabulated element of the methodology lacks nuance and variables. For example, the definition of Landscape Sensitivity relies heavily on the formal designation of the landscape. It is agreed that Landscape Value within nationally designated landscapes should be at the highest level (e.g. expressed as high/ very high/ of national value), but this is not a singularly determining factor of landscape value. and for a proposal of this scale it is expected that there would be a more descriptive approach.</p> <p>3.4.17 The Applicant at paragraph 8.14.4 states that the proposed planting would have a longterm benefit of reinforcing the landscape character of the local landscape. We disagree with the Applicant's claims.</p> <p>3.4.18 At paragraph 8.11.53, with regards to decommissioning the solar farm, an assumption is made that the equipment is fully removed, with the Project Sites restored to agricultural land/improved grasslands (its predeveloped (baseline) condition). However, this is unlikely to be possible as some of the fields will now have hedgerows traversing through them, having associated implications on the useability of the fields for agricultural purposes. We therefore disagree with the Applicant's claims.</p>	<p>GLVIA3 (LI and IEMA) refers to 'openness' once - in the context of perceptual landscape characteristics (paragraph 5.4). It is not part of visual impact. The Landscape Institutes position on this is reiterated in LI TGN-2024-01, at point 9(4) which, in response to the question "<i>How does LVIA relate to green belt and 'openness' issues?</i>" explains that "<i>As stated in GLVIA3 paragraph 5.4, 'openness' may be one of the aesthetic and perceptual aspects of the landscape Where this is the case, it would be documented and assessed as part of the LVIA. Green Belt is a planning policy designation and compliance with policy should be addressed separately to the LVIA.</i>" As such 'very special circumstances' is considered within the Planning Statement.</p> <p>LVIA is concerned with the effects on landscape character and the views available to people. GLVIA 3 states "An assessment of visual effects deals with the change and development on the views available to people and their visual amenity" [GLVIA3 emphasis]. Visual assessment does not consider settings <i>per se</i>..</p> <p><u>Cable Route Corridor Options (Para 8.9.20)</u></p> <ul style="list-style-type: none"> The works related to the construction of the Cable Corridor would comprise short sections traversing through several Landscape Character Areas (LCA) (including the Eastern Parks and Valleys, Eynsham Vale, Lower Windrush Valley and Eastern Thames Fringes, Wooded Corallian Limestone Ridge, Corallian Limestone Ridge with Woodland LCA). <p>None of the LCAs, within the LVIA study area are subject to landscape designations, indicating to medium value. The agricultural nature of the landscape, through which the cable corridor passes, is considered to have a low susceptibility to the type of development proposed.</p> <p>Due to the nature of the development, the temporary construction activities associated with the cable corridor would generally only cause disruption during the construction phase. The construction works would be carried out sequentially rather than concurrently along the route. Once operational, the cable would be hidden underground with only inspection covers visible at the joint bays and link boxes. The existing habitats and features affected by the construction would be reinstated following completion, with no significant landscape effects likely to persist post-construction and therefore operational impacts attributable to the cable corridor have been scoped out.</p> <p>As a core principle, existing landscape features are intended to be retained and the removal of hedgerows has been avoided as far as practicable (paragraph 6.4.20 of Chapter 6: Project Description [APP-043]). As such, the inherent characteristics and physical landscape features would be unaffected. Based on this, the overall sensitivity of the landscape receptors is evaluated as having a medium-low sensitivity to the type of development proposed. This type of construction work would result in a direct overall small-scale localised temporary change to the existing landscape resource.</p> <p>The temporary nature and reversibility of the effects will minimise any perceived impact, which is considered to be of a Low magnitude upon the LCAs.</p> <p>The magnitude of impact would decrease to negligible beyond the proximity to the works area. The Low magnitude of change upon a medium-low sensitive landscape would result in Minor to negligible and not significant effects. The nature of these effects would be direct, short-term, localised (reversible) and adverse.</p> <p>Landscape sensitivity is judged by considering the component judgments about the value and susceptibility of the receptor. Table 8.9 presents that the value of the landscape is mainly determined by the designation, but not exclusively. However, landscape designations are not the sole indicator of landscape value (paragraph 5.26, GLVIA3). Relevant Guidance in para 8.4.2 - Landscape Institute Technical Guidance Note 02/21 'Assessing landscape value outside national designations'</p>	Landscape and Visual Impacts
REP1-114	Stop Botley West	<p>Main Conclusion (Landscape)</p> <p>3.4.20 As a result of the above deficiencies, the solar arrays are proposed in locations where the potential impact has not been considered in enough depth and the resulting mitigation is simply to seek to minimise the visibility of the panels. The mitigation proposed fundamentally and adversely changes the physical and perceptual qualities of the landscape and the experience for the visual receptors. The Project design has therefore been inadequately informed by landscape constraints and has not taken approach where the natural landscape and the receptors within it are the framework for shaping the design of the project.</p>	<p>NPS EN-3 encourages Applicants to "<i>minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape</i>" (NPS EN-3, paragraph 2.10.43). It also requires Applicants to "<i>consider and maximise opportunities to facilitate enhancements to the public rights of way and the adoption of new public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights or the creation of permissive paths)</i>" (NPS EN-3, paragraph 2.10.44).</p> <p>As detailed above, NPS EN-3 encourages Applicants to minimise the visual impacts of developments. This has been achieved through the production of the Illustrative Landscape Masterplan [APP-062]. This has considered and minimised landscape and visual impacts as set out in NPS EN-3.</p>	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-114	Stop Botley West	<p>2.1 Reasonable Alternatives</p> <p>2.1.1 Chapter 5 of the Environmental Statement (“ES”) relates to alternatives considered. From the information presented, SBW is not convinced that planning and environmental constraints played any substantial role in site-selection. In relation to a grid connection, this is located within the very southern land parcel some distance from the body of the scheme. As such, it is apparent that site selection has been driven almost entirely by land availability and the need to maximise developable area given the distance of most of the scheme from the point of connection into the grid.</p> <p>2.1.2 In relation to constraints generally, the ES states that efforts were made to avoid or minimise impacts on the Blenheim Palace World Heritage Site, which is a heritage asset of the greatest importance. It also states that visual effects were dealt with through selecting relatively low-lying land, avoiding Best and Most Versatile Agricultural Land; secure biodiversity net gain, avoiding key landscape and environmental designations and areas of high flood risk.</p> <p>2.1.3 To the above points generally, most of the Site is located within an area of high landscape sensitivity. It also comprises a significant proportion of high quality (i.e. Best and Most Versatile Agricultural Land) and would have a significant impact on the setting of Blenheim Palace and surrounding heritage assets. Sources of flood risk other than fluvial (such as surface water) do not appear to have influenced site selection to any material degree, nor is reference made to seeking or developing lower performing Green Belt land in preference to higher performing Green Belt land.</p> <p>2.1.4 Even though the Site itself may not be within a National Landscape, it has the potential to impact the setting of the Cotswolds Area of Outstanding Natural Beauty (“AONB”) and no assessment work has been undertaken in respect of this impact. The same is also true of the numerous heritage assets located near the Site, which would have their rural landscape settings altered for a considerable amount of time for the Project’s lifespan. There would also be permanent setting impacts arising from the retention of the hedgerows proposed to be planted.</p> <p>2.1.5 Chapter 5 of the ES does not seriously engage with reasonable alternatives, particularly in respect of advancing a smaller scheme which more appropriately addresses the surrounding environmental sensitivities and given that the original, minimum threshold for site size was 250ha [ES Chapter 5 – Alternatives Considered - paragraph 5.6.12].</p>	<p>2.1.1 The IP accepts that planning and environmental constraints played a role in site selection but they are concerned about the extent of the role they played.</p> <p>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:</p> <p>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</p> <p>The Applicant has followed this policy. The chronology followed and the reasons for the location is set out in Chapter 5 [APP-042]; 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.</p> <p>In NPS EN-3, para 2.3.4, it states that</p> <p><i>‘The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in Section 4.1 of EN-1, will not grant consent in any given case...’</i></p> <p>At para 2.3.5, <i>It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure....</i></p> <p>The Applicants approach to site selection is consistent with all relevant aspects of the NPS’s.</p> <p>2.1.2 Noted.</p> <p>2.1.3 NPS policy does not preclude NSIP development in areas of landscape sensitivity, on BMV, nor Green Belt. The Applicant has demonstrably had regard to these constraints and provided reasoned explanation and/or justification where relevant. The Applicant has demonstrably sought to avoid significant adverse effects upon the WHS any important underground archaeology, and other heritage assets. Chapter 7 in the ES sets out the approach and impacts [APP-074].</p> <p>2.1.4 The Applicants’ position is that there is no adverse impact upon the former Cotswold AONB. There are over 30 references to the Cotswold AONB in Chapter 8 of the ES [APP-045]; it has been assessed and the effect upon it reported.</p> <p>2.1.5 The IP accepts that the Applicant has addressed alternatives, but question the ‘seriousness’ of the assessment, asserting they should have advanced a smaller scheme.</p> <p>The Applicant’s assessment of alternatives accords with NPS policy and EIA guidelines. A summary of the alternatives studied having regard to the environmental effects are set out in Table 5.1. [APP-042].</p> <p>Do nothing (no development scenario)</p> <p>Site location and scale;</p> <p>Site layout and design;</p> <p>Choice of solar array;</p> <p>Cable corridor route and laying method</p> <p>These sections answer in detail the way in which the site was selected.</p> <p>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].</p> <p>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. Policy references to need for deployment at scale can be found at NPS EN-1 paras. 4.2.2 to 4.2.4. Also see Chapter 5, Alternatives, para 5.5.7 [APP-042]. Other references to scale are found in Table 5.1, page 13 and 17.</p> <p>See also Applicants Supplementary Statement of Need (PDB–014) which addresses additional reasons for the siting and scale of the solar farm.</p> <p>In summary the need is defined as urgent in UK policy, all suitable sites are likely to be needed and there is no limitation in policy terms to scale and/or capacity of solar projects.</p> <p>The reference to 250ha made by the IP, is set out in full at paragraph 5.6.11 of Chapter 5 of the ES [APP-042] which states:</p> <p><i>“Initially, to commence the land search, the Applicant sought sufficient land to provide a ‘hub’ around which other land might then also be conjoined to allow a solar farm to be developed at scale. The search began to find at least 250ha of land, ideally in a single ownership. A larger area of land would not be ruled out if suitable and available.”</i></p>	Alternatives and Roofs

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-114	Stop Botley West	<p>4. Summary & Conclusion</p> <p>4.0.1 The conclusions of the heritage, landscape and visual assessments submitted as part of the application are not credible and, as a consequence, fail to reflect the significance of the World Heritage Site setting; the high quality of the landscape within that setting; the sensitivity of receptors to change that landscape; and inadequate assessment methodologies for a development of this scale.</p> <p>4.0.2 The Project has failed to have regard to good design principles and the mitigation hierarchy in its design and in addition to the fundamental landscape and heritage concerns, SBW has also highlighted concerns about the impact on the Green Belt, tourism, agricultural land quality, flood risk and residential amenity.</p> <p>4.0.3 SBW objects to the Project as submitted and advises that the Secretary of State does not make the Order.</p>	<p>4.0.1 The Applicant notes the IP objection but disagrees with them. The approach to assessment was set out in the Scoping Report (in which study areas, approach to baselines and methodologies etc were set out) and further developed in response to the Scoping Opinion issued by PINS [APP 125 and 126 respectively]. Extensive consultation has been undertaken and the approach to design and layout of the Proposed Development has responded to this (evidence more recently by the Applicant's willingness to alter their layout near Oxford Airport and that south of Bladon, near the WHS), and the constant application of the mitigation hierarchy as the scheme evolved.</p> <p>4.0.2 These concerns are noted, but it is the Applicant's position that it has had regard to all the matters cited and has carefully addressed each within its ES and Planning Supporting Statement [APP-225].</p> <p>4.0.3 The Applicant notes the IP's advice to the SofS, but considers that the Applicant's submission, whilst identifying some adverse effects that have been assessed in the Environmental Statement, has nevertheless avoided, minimised and/or mitigated against them. Given the policy support and urgent need to secure quickly this form of renewable energy, and given that in the Applicant's view that the harm is more than outweighed by the benefits, the Applicant has made a compelling case for the DCO to be granted.</p>	Alternatives and Roofs
REP1-114	Stop Botley West	<p>3.2 Green Belt</p> <p>3.2.1 Within its Planning Supporting Statement inc. Green Belt Case [EN01047/APP/7.1], the Applicant considers that conflicts with the purposes of the Green Belt and "some" harm to openness would occur, but that these are "limited, temporary and reversible." SBW considers that this fails to capture the substantial impacts on the Green Belt, which would occur by virtue of:</p> <ul style="list-style-type: none"> Urbanising significant areas of Green Belt between settlements resulting in coalescence (e.g. Long Hanborough/Bladon and Bladon/Begbroke); Significantly encroaching into the countryside by virtue of the Project's scale; and Significantly impacting the setting of historic settlements (see heritage section below for further details) <p>3.2.2 The Project's spatial relationship with the Green Belt existing settlements is illustrated at Figure Number NP12426 GB1 Rev 03 appended to the Planning Supporting Statement. This serves to underline the Project's substantial impact in terms of the above Green Belt purposes set out within paragraph 143 of the National Planning Policy Framework 2024 ("NPPF 2024") and upon the Green Belt's openness, by reason of the Project's substantial spread and scale.</p> <p>3.2.3 It is uncontroversial that the Project represents inappropriate development within the Green Belt and therefore it should not be approved other than in very special circumstances ("VSCs"). Paragraph 153 of the NPPF 2024 states that harm arising from a proposed development by reason of inappropriateness should be given substantial weight in the Green Belt and should not be approved except where the VSCs clearly outweigh both the harm arising to the Green Belt and any other harm arising.</p> <p>3.2.4 It is accepted that since the Project represents Critical National Priority ("CNP") Infrastructure, the starting point for decision-making is that such infrastructure needs to be treated as if it has met the VSC test [NPS EN1 – Paragraph 4.2.17]. This does not, however, obviate the requirement for good design and to have regard to the purposes and openness of the Green Belt in the formulation of the Project. The matter is given some perfunctory consideration in Environmental Statement Volume 1 Chapter 5: Alternatives Considered [EN010147/APP.6.3] and the Planning Supporting Statement (EN01047/APP/7.1). These documents simply conclude that a non-Green Belt site was not available to the Applicant. However, not all parts of the Green Belt perform equally well and there is no reference to considering Green Belt purposes or openness in Section 5.7 "Site Layout & Design."</p> <p>3.2.5 It is plain from a review of the evidence base that the Project would adversely impact a particularly high-performing area of Green Belt. We refer to the Oxford Green Belt Study prepared by LUC dated October 2015 (Appendix 1). It is noted that a significant proportion of the Site around Cassington, Bladon and Begbroke occupies Broad Area 13. In relation to this area, the Study found that:</p> <ul style="list-style-type: none"> The broad area plays a role in preventing the reduction in the physical and visual gap between Bladon, Begbroke and Kidlington; The broad area is rural in character and contains many natural features including the ancient woodlands of Burleigh Wood, Blandon Heath and Begbroke Wood, as well as open agricultural fields with open views of the surrounding countryside; and 	<p>The Applicant has produced a Planning Supporting Statement (PSS) which draws overall conclusions as to the planning balance in respect of the Project [APP-7.1]. 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Specific responses:</p> <p>3.2.1 The IP does not take issue with the fact the development is temporary and reversible, but the degree of harm it causes. The Applicant accepts that some harm is caused and reports this. The parties may disagree over where and how that harm is applied, but the applicant is of the view that a VSC case is able to apply to this case, and the Applicant sets the VSC case out then balances that against identified harm</p> <p>3.2.2. Noted. The applicant has objectively applied relevant Green Belt tests and how openness can and should be examined.</p> <p>3.2.3 Noted.</p> <p>3.2.4 The Applicant welcomes the acknowledgement by the IP that this is a CNP project. However, despite being CNP and the presumption afforded by that status i.e. that the VSC is met, the IP then goes on to assert that those tests are not met.</p> <p>The Applicant is of the view that to the extent addressing those Green Belt tests are relevant given the CNP policy presumption, the Applicant has, nonetheless, analysed the openness and the purposes of Green Belt in its Planning Supporting Statement [REP1 -012].</p> <p>The IP also refers to the need for good design. The Applicant has described the evolution of the design and layout of the project in Chapter 5 of the ES [APP-042]. It has explained how the design process was conducted (paragraph 5.6.15 to 5.6.17 inclusive and 5.7.1 to 5.7.5 inclusive).</p> <p>The IP also suggest that no Green Belt land was available to the Applicant. This reference is true in respect of the 400 kV substation location from which the connection has to be made; but not all of the site is within Green Belt. Approximately 31% of the total area of the Project site (the DCO Order Limits) lies beyond the Green Belt and 69% falls within it.</p> <p>Design Principles were established from the outset (Para.5.6.15), and the Applicant then describes how these principles and protection measures can be secured post consent via the Outline Layout and Design Principles document [PDB-012].</p> <p>The IP also states that there is no reference to considering Green Belt purposes or openness in section 5.7 of Chapter 5 on Alternatives [APP-7.1]. Whilst there is no express reference to Green Belt in this section of the document, it would be misleading to imply that Green Belt purposes and openness was ignored. Paragraph 5.7.1 refers to an exercise of plotting high</p>	Green Belt

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<ul style="list-style-type: none"> The broad area contributes to the setting and special character of Oxford as a historic city. <p>3.2.6 The Project would significantly reduce the gap between Bladon and Begbroke as well as Bladon and Long Hanborough. The rural character and natural features which characterise this part of the Green Belt, as well as the open and exposed views of the surrounding countryside, would be significantly encroached upon by the Project and could also affect the character and setting of Oxford (which has not been considered at all within the Application material, as discussed in further detail below).</p> <p>3.2.7 NPPF 2024, paragraph 148 sets out that where it is necessary to release Green Belt land for development priority should be given to previously developed land, then “grey belt” which is not previously developed and then other Green Belt locations. There is no indication within the application material that the Applicant considers the Green Belt elements of the Site to be “grey belt” and accordingly, the relevant portions of the Site fall to be considered as “other Green Belt locations.” Site selection has not followed a sequential approach to the Green Belt which the NPPF, para 148 indicates is necessary.</p> <p>3.2.8 We consider that the Applicant should not just demonstrate the need for a Green Belt site generally, but also why what are evidently very sensitive parcels of Green Belt host a substantial amount of developable area with substantially harmful consequences in terms of both loss of openness and conflict with Green Belt purposes.</p> <p>3.2.9 We are aware of the emerging Government policy in respect of the role of the Green Belt in the planning system. We expect further guidance to be published within the PPG shortly, and we reserve the right to make comments on this during the DCO Examination.</p>	<p>level constraints, including various factors then listed (which did not refer to Green Belt matters), but the Applicant can confirm that exercise did include mapping on the Oxfordshire Green Belt. The Applicant retains plans dated in 2021 to show this. Also, paragraph 5.7.2 then goes on to state that: <i>This provided a framework within which the Applicant could start to consider ways in which the site could be designed and laid out that minimised or avoided conflict with these assets and other environmental factors.</i> [including Green Belt].</p> <p>Lastly, the Applicant has in Appendix 8 (Green Belt), of the Planning Supporting Statement [REP1-012], page 123, para 8.4.14, provided examples of where installation was removed to improve openness and/or avoid coalescence. The Applicant would also draw attention to its intention to make a second Change request to remove significant areas of installation within the Central Site, which will help to further minimise harm to openness and Green Belt purposes.</p> <p>3.2.5 and 3.2.6 The Applicant notes the matters raised in this paragraph. However, in respect of the analysis of the function of the Green Belt, and its purposes, both the Applicant and IP's, including the host authorities, may need to revisit this in light of the PPG on Green Belts published February 2025.</p> <p>Amongst other matters, this PPG has changed the way in which one should assess the contribution land makes to the relevant Green Belt purposes. Some IP's (e.g. RR 1007) are relying upon existing Green Belt Studies prepared by the authorities in asserting a conflict between the Applicants analysis and the importance attributed to certain gaps between settlements in these studies e.g. In particular, some refer to the Oxford Green Belt Study prepared by LUC dated October 2015 and the importance of various parts of the Green Belt e.g. the gaps between Long Hanborough/Bladon and Bladon/Begbroke. However, this study may now be redundant or at least largely undermined in light of the new guidance.</p> <p>The new PPG on Green Belts states at paragraph: 004 Reference ID: 64-004-20250225, that:</p> <p>“...when making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d. Considerations for informing these judgements are set out below:</p> <p>Purpose A – to check the unrestricted sprawl of large built up areas</p> <p>This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas...”</p> <p>Purpose B – to prevent neighbouring towns merging into one another</p> <p>This purpose relates to the merging of towns, not villages.</p> <p>Purpose D – to preserve the setting and special character of historic towns</p> <p>This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. “</p> <p>So studies such as that undertaken by LUC now appear to be out of date as they have assessed the functions of gaps between <i>villages</i>, when it is <i>towns</i> that now should be considered in relation to Purpose A, B and D. Hanborough/Bladon and Bladon/Begbroke and indeed Kidlington are all villages close to the Order Limits of the Applicants Project.</p> <p>The nearest towns for these purposes are now Banbury and Woodstock to the North, Witney to the West, Oxford City to the East and Abingdon to the South.</p> <p>3.2.7 In respect of whether there is a sequential test or consecutive approach when it comes to finding development sites in Green Belts, as the IP claims i.e. that one has to consider brownfield sites first before selecting Green Belt land, the Applicants position is that policy in this respect is a ‘preference’ not an absolute ‘requirement’. This position is explained below.</p> <p>Only in NPS EN-3 para. 2.10.29 and 2.10.31 does it make a reference to this matter.</p> <p>Para.2.10.29 states: “<i>While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land...</i>” .</p> <p>At para 2.10.31 of NPS EN-3, it notes the ‘<i>preference</i>’ for development to be on suitable brownfield...land”.</p> <p>In NPS terms therefore, the Applicant characterises policy as a preference in policy terms not a requirement, and even then only where possible and where suitable.</p> <p>To reinforce the point, in NPS EN-3, para 2.3.9, it states that as most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land).</p>	

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>Beyond the NPS policy above, the NPPF (para 148) talks about a sequential test but only when considering a <i>change</i> in Green Belt boundaries or the <i>release</i> of Green Belt. The applicant is not seeking a change to nor a release from the Green Belt, and in the Applicants view therefore, para 148 does not apply.</p> <p>Notwithstanding the policy position on this matter, the Applicant, in its search for suitable sites, did not rule out the use of previously developed or brownfield land. For example, the Applicant did look at land near to, and grid connection at, the former Didcot A power station, but that was controlled by RWE and neither the connection nor the land was available to the Applicant. Shortly after the Applicants enquiry, both the land (part of) and connection was subsequently used by a recently consented, and now constructed, data centre.</p> <p>3.2.8 The Applicant notes the IPs' request for the Applicant to also demonstrate '<i>...why what are evidently very sensitive parcels of Green Belt host a substantial amount of developable area with substantially harmful consequences in terms of both loss of openness and conflict with Green Belt purposes.</i>'</p> <p>The Applicant does not rely upon a distinction between more or less sensitive parts of the Green Belt in the way the IP sets out. That approach, it seems to the Applicant, relies upon there being a study which fully reflects the new PPG on Green Belts published in February 2025; currently no such Green Belt study for this area exists that accurately reflects the new emphasis on towns rather than villages when assessing Green Belt function.</p> <p>The Applicant, however, did focus on one area (Bladon and Begbroke) where it appeared to the Applicant was sensitive to the risk of coalescence and diminished sense of openness, but this is again now not accurate as it has relied on gaps between villages not towns.</p> <p>The Applicant's current assessment as set out in Appendix 8 of the Planning Supporting Statement, in paras 8.4.4 to 8.4.31.</p> <p>However, the Applicant has undertaken a preliminary review of this in light of the new PPG and the Applicants updated assessment concludes that there is no change to the level of harm assessed except in the case of Purpose B, to prevent neighbouring towns from merging into one another. In this case, conflict is less than previously assumed. In their analysis, the Applicant had incorrectly identified that the narrowest point of the Green Belt which the project affected, was between Bladon and Begbroke. Under the new guidance this analysis is redundant insofar as both these settlements are 'villages' and these are now excluded from assessment in terms of function in the latest guidance. The nearest 'towns' now affected by the Project are Woodstock to the north, Witney to the west, Oxford to the east and Abingdon to the south. Given the much more significant areas of openness between these towns and the Project, the threat of merging is diluted even further.</p> <p>3.2.9 Noted.</p>	
REP1-121	Sustainable Woodstock	3) Aviation – Oxford airport Bird numbers were discussed. Possible increase due to displacement. I understand this but what about the large parcel of land in Begbroke where about 500 homes and University labs have been approved. We also see adverts for increasing private jets at Oxford airport that will increase noise and pollution and there was no mention of this	The cumulative effects of Project's construction, operation and decommissioning and other projects in the zone of influence are assessed on all nature and conservation receptors in ES Chapter 9 Section 9.11 and 9.12 [PDB-008] . No cumulative impacts were considered likely.	Aviation
REP1-121	Sustainable Woodstock	1) Landscape, views, industrialisation and brutal images. Some were understandably personal and occasionally gave emotional viewpoints. There was a comment on medieval views spoilt and hedgerows changing views. Other comments include 'Visual impact on visitors approaching Blenheim appears to be overlooked'. I have another perspective - that the views are forever changing. Forests have been removed for farming, etc. Hedge numbers increased over centuries and then later removed to make farming more efficient. Now "we" say we need to plant new hedges to support wildlife, increase biodiversity. There are reports that laying new hedges is much better than planting trees, as the biodiversity gain is many times greater than in woodlands. There are plans for many new homes in all the villages and especially near the airport in Begbroke and many more in Woodstock. Intensive farming methods using fertilizers, herbicides and pesticides have not only been polluting our rivers but have severely eroded the soils and had massive impacts on our wildlife. However, there is a romantic view that this such a green and pleasant land. Valleys are ruined by coal mining and yet many years on they are gradually being returned to green wildlife friendly areas. There are many more examples. Rising sea levels will make a huge change to our views and landscape as the planet warms. Nothing stays the same. When it comes to having an effect on well-being, etc of course there can be no denying of the change that affects somebody directly. The landscape including noise during operation should be carefully planned, based on experience and knowledge and carefully managed and monitored with people and wildlife in mind. Even then we will get a few things wrong.	<p>The impacts of the Project will be minimised by a comprehensive designed-in landscape mitigation scheme. As shown on the Illustrative Masterplan [APP-062], Landscape, Ecology and Amenities Plan [APP-228] and Outline Landscape and Ecology Management Plan [APP-235].</p> <p>All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once proposed planting has matured.</p> <p>Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass. Wider green corridors are also characteristic of the existing landscape, e.g., much of Dornford Lane (PRoW 416/11/30) which passes through the middle of the northern section of the Project.</p> <p>It is intended that the proposed landscape mitigation would be retained, post-decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, at the same time improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW</p>	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>corridors, views of the wider landscape and key features such as church spires, distinctive landforms (including Burleigh Wood) would remain open and available to visual receptors. The retention of proposed designed-in landscape mitigation would enhance the key characteristics of host landscape character areas and be in line with recommended guidelines and enhancements priorities. For example, LCA 4: Estate Parks and Farmlands, which covers much of the northern section of the Project, has the following priorities which the Project and proposed landscape mitigation takes account of and reinforces:</p> <ul style="list-style-type: none"> • <i>retain mature boundary and roadside trees and replant as necessary;</i> • <i>manage and extend existing areas of woodland to maximise their wildlife and landscape value;</i> • <i>plant new blocks and belts of broadleaved woodland within estate farmland to reinforce typically enclosed, well-wooded character.</i> (Page 35, West Oxfordshire Landscape Assessment 1998). <p>Future Baseline</p> <p>Within the LVIA, the mitigation proposed as part of the Project would not alter the baseline view(s) as the planting would form part of a future baseline scenario. Planting that would alter the baseline views, particularly at Year 15, but also forms part of a baseline scenario are large areas of woodland planting being undertaken, much of it within the Blenheim Estate, in areas close to the Project. Areas of these new woodlands are shown on the Illustrative Masterplan [APP-062] and can be seen in many of the baseline views, such as Representative Viewpoint 10 [APP-065 and 066]. Where visible, the new woodland has been factored into the LVIA assessment of effects and it has been assumed that, like the proposed mitigation, this woodland would be established at summer Year 15 and so further minimise potential effects.</p> <p>In respect of NPS EN-1, the Applicant acknowledges paragraph 4.1.5 which sets out the need to avoid, reduce, mitigate or compensate for any adverse impacts (the mitigation hierarchy). As confirmed by paragraph 4.2.11 of NPS EN-1, Applicants must apply the mitigation hierarchy and demonstrate that it has been applied.</p> <p>However, for clarity, the Applicant also reiterates that paragraphs 5.10.5 and 5.10.13 of NPS EN-1 state that:</p> <p><i>"5.10.5 Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.</i></p> <p><i>5.10.13 All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites".</i></p> <p>This is supported by paragraph 4.2.15 of NPS EN-1 which provides that <i>"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts".</i></p> <p>Therefore, even where residual landscape and visual impacts are present, this does not preclude the granting of consent. The national policy envisages consent being granted with such conclusions.</p> <p>In any event, the Project demonstrates the application of the mitigation hierarchy in the following ways:</p> <p>Avoid</p> <ul style="list-style-type: none"> • Early site visits were completed to Blenheim Palace. As part of this process, a field was identified as being visible from the palace grounds. A part of the design process this field was removed from the development in order to avoid the potential visual effects upon the WHS. • A minimum 25 m buffer zone, from individual properties and settlements, has been incorporated into the Project. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which further limits the effects of the Project. Mitigation, as shown on the Illustrative Masterplan [AS-019] and the Landscape, Ecology and Amenities Plan [AS-022], was included to further screen available views from residential properties. • Approximately 35 hectares has been removed from the Project in order to avoid harm to identified archaeological features throughout the Project Site. In doing so, this would also have some benefit to biodiversity and potential landscape and visual effects breaking up the absolute visibility of the Project. 	

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
<p>Reduce / Mitigate (minimise)</p> <p>Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [AS-019] and the Landscape, Ecology and Amenities Plan [AS-022]. (Refer to response to Point 3 above for further clarification).</p> <ul style="list-style-type: none"> Trees - In general trees are being retained wherever possible Hedgerows –The maximum to be removed is approximately 666 m of hedgerows and non-hedgerow linear features at 80 locations. <p>Compensate</p> <ul style="list-style-type: none"> Trees – The number of trees that are being planted will exceed those removed. Hedgerows – At least 26.5 km of new species-rich hedgerow Additional habitat creation will include: <ul style="list-style-type: none"> Approximately 100 ha of new Floodplain mosaic habitats along the River Evenlode Corridor At least 26 km of existing hedgerow to be reinforced through additional planting Approximately 5 ha of new native woodland creation Wildflower grasslands to be managed for wintering and breeding birds Tussocky grasslands alongside hedgerows. Hedgerow buffers will be at least 5 m wide Flood attenuation features to north of Cassington to be managed as wetland habitats Additional mixed scrub habitats alongside hedgerows A range of grasslands within the solar arrays to be managed for conservation value. 				
REP1-121	Sustainable Woodstock	2) A comment was made: 'What the developers don't tell you is it never will be 840MW of power into the national grid'. This comment amongst others is surprising and disappointing from a scientist and demonstrates a misunderstanding of the terminology used in solar farms and possibly an attempt to mislead. The science is proven as part of the solution to net zero in the UK. Very recent facts from Carbon Brief. "For the first time, solar was >10% of UK generation in consecutive months (April/May 2025) In 2025, solar has avoided gas imports that would've cost £600m" Other comments made include 'The UK really isn't very good for solar' after referencing a survey by the World Bank. However, the way in which the data is presented is again misleading as the paper while saying that we were poor for sunlight concludes that it is still worth installing as part of the required energy mix. This was missed from the statement made. Ireland were the worst but they continue to install solar farms.	The Applicant notes this comment by Sustainable Woodstock, made in response to comments from an IP at the Preliminary meeting Open Floor Hearing.	Needs Case
REP1-122	Sustainable Woodstock	A further comment on Community Benefit - We heard several voices of concern that Botley West developers are treating residents unfairly. £5000 per MW seems fair when so many residents and such high value land and landscape is being compromised. While there is no process in place for calculating community benefit it would hard to swallow if the developers of this very large solar farm manages to slip their agreement under the wire before the UK Government can finalise process/produce guidelines, etc. It would be so ethical if they voluntarily used an acceptable calculation (such as the Scottish) – but am I being too naïve? Could it be possible that the developers, with all their resources are not prepared to do the kind of research we were able to do? They should come up with a voluntary figure close to what is fair. We have hard-pressed them to get this far. Instead, they have had secret meetings with parish councillors who really have no experience of these matters and were not prepared sadly prepared to say anything at the hearings. I have been told (today 4/6/25) that the figure has now been increased to £440,000 per annum (10 times less than it should be i.e. £523/MW). £5000 per MW would give £4.2million per annum. This is not 'proportionate' as the applicant put it. This is a huge loss to communities. These lost funds if agreed could have been used for the widespread decarbonising of neighbourhoods, insulating homes, improving community facilities, etc. We agree with Cherwell Collective who said " £5000 per MW. We strongly suggest this benchmark be set for Botley West as a contingency for approval"	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
REP1-123	Sustainable Woodstock	Written response to allegations made at Preliminary Session 13 May 2025.	The Applicant notes the response of Sustainable Woodstock to the comments made by Mr Ivanovic at the Preliminary Hearing on 13 th May, and their status as a Community Action Group.	Acknowledgement
REP1-124	Sustainable Woodstock	I'm representing the views of sustainable Woodstock. I spoke earlier in the week on community benefit and, I really don't understand, why everyone thinks that the community benefit doesn't play any part in the application ... when it clearly does play a part in reality.	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	Community Benefits and Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>We can see other proposals where there have been significant amounts of money going to communities for various projects.</p> <p>We know that in Scotland that there are guidelines. We know that in England there are no guidelines. Obviously, we would like there to be guidelines for these kinds of developments. We've spoken about various ways of dealing with that. And of course, it can be with an amount per megawatt, which in Scotland is for the wind farms is £5,000 per megawatt generated. And it's easy to do that calculation, if £5,000 times 840MW, then it's £4.2 million per year index linked as well.</p> <p>And that's for 37 years. That's a large amount of money going to communities to use in a way in which they decide how they should be used, strategic or community specific. So if this isn't necessarily concrete, there are other examples around England where the money has been agreed. We know there are consultations on community benefit in the background, and it would be good to use this project, if it is consented, to become an exemplar for the whole of England, for all the other future proposals that are going ahead. We've heard about 17 communities I think that are going to be affected by the proposal. So, you know, while the onshore wind turbines are slightly different, those wind farms are often in not exactly remote, but they may affect very few residents compared with what's happening in this Botley West. And consequently, I think there's an equal weight to a solar farm here as a wind farm elsewhere.</p> <p>So for this particular proposal, because it's in the vicinity to people, communities and to World Heritage sites, all those reasons that have been noted earlier in the week. So I just feel that there should be much more pressure to put on something more concrete for this particular one and then use it as an exemplar going forward.</p> <p>But, I think that we've had a couple of meetings with, with PVDP in the last couple of years as a community group. There's obviously been movement. I mentioned this, we started off with zero. We went to £50,000 and people said, well, that's wonderful, isn't it? £50,000 between how many. Then it leapt to £200,000 and it's still woefully low compared with £5,000 /MW, which I feel communities should receive that money and manage it effectively for communities.</p> <p>Note: There was a previous benchmark stated nearby at the hearings - an existing 4.5MW solar park. The community benefit is £45,000 per annum. That's for 4.5MW. That is £10,000/MW. Granted this is a community project but they have contributed already 300,000 in about 5-6 years. This plan is for 840 MW and I don't think you need to be a professor to work out the difference in what is being offered.</p>	<p>parish councils. The Applicant has raised the fund to £525 per MW, £441,000 annual contribution.</p> <p>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.</p>	
REP1-125	Sustainable Woodstock	To summarise - covers same points raised in REP1-122 and REP1-124	<p>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.</p> <p>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.</p>	Community Benefits and Impacts

2.3 Public/Landowner

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

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-132	Bojan Ivanovic	2. Mischaracterisation of the Project <ul style="list-style-type: none"> The Fiction of "Temporary" Development 40 Years Is Permanent for Affected Residents and Green Belt A Shift from Farming to Industrial Land Banking Greenwashing to Mask Financial Motivations 	<p>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 most 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.</p> <p>The Applicant refers to what was said in response to concerns raised about the change in land use and the use of Green Belt land at the Open Floor Hearings 1 and 2, and Issue Specific Hearing 1, which are outlined and expanded upon in the Applicant's Written Summary of Oral Submissions at the Open Floor Hearings (OFH1 & OFH2) [REP1-018] and Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-019].</p>	Legal
REP1-133	Bojan Ivanovic	5. Energy Strategy Misinformation <ul style="list-style-type: none"> UK Climate Unsuitable for Large-Scale Solar Neglect of Superior Renewable Alternatives Solar Generation Ineffective in Local Conditions 	<p>The role of large-scale ground mounted solar in the energy mix is a matter of UK planning policy and not something that the Applicant can dictate.</p> <p>The support for such infrastructure, which would include Botley West, is clear and unequivocal in the National Policy Statements. For example, paragraph 3.3.20 of NPS EN-1 states that "Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Further, paragraph 2.10.9 of NPS EN-3 states that: "The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050. As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector."</p> <p>In that context, 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 particularly viable and efficient location for solar PV generation.</p> <p>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.</p> <p>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.</p> <p>The Project is designed to operate effectively under UK solar conditions using 1.8–2.2 million PV modules, delivering a peak capacity of 1,200–1,375 MWp and approximately 840 MWe AC output (Table 6.3, Chapter 6: Project Description [APP-043]).</p> <p>The modules comply with international standards (IEC 61215-1:2021), ensuring reliable performance in low irradiance and variable weather (Section 6.4.8 [APP-043]). Given the urgency of achieving the UK's 2050 Net Zero commitments, action within this decade is essential. While nuclear power may play a supporting role in the long term, relying on its future deployment is not a viable strategy for tackling the immediate challenges of climate change. NPS EN-1 indicates that the role of nuclear power will be in the 2050s (paragraph 3.3.53).</p> <p>Solar and wind energy offer complementary benefits, with generation peaks that often occur under contrasting seasonal conditions. Solar installations such as Botley West perform optimally in the sunnier, longer days of summer, while wind turbines tend to be more productive during the windier, darker winter months. This seasonal variation in output aligns well with patterns in national electricity demand. Wind turbines are generally unsuitable for built-up areas due to noise and infrasound, which are often met with strong local resistance.</p> <p>Just maintaining the current ratios of installed capacity to meet local energy demand in Oxfordshire, would require 2.3GW of solar. There is no clear or obvious prospect that other forms of renewable energy could step up to meet this demand, so solar presents an obvious solution. Assuming a land use take of 1.5ha per megawatt of installed capacity, accommodating this level of deployment would require around 3,450 hectares of land.</p>	Principles of Solar Development and Amount of Electricity Generated
REP1-133	Bojan Ivanovic	7. Economic and Financial Manipulation <ul style="list-style-type: none"> No Reduction in Consumer Energy Bills - Project Driven by Land Value Uplift, Not Net Zero Public Subsidies Mask True Developer Profits Hidden Costs Passed to Consumers Through Green Levies 	<p>A reduction of consumer energy bills can be achieved by way of increasing the supply of energy through additional 35GW of solar PV capacity by 2030 to which the Project will contribute. The Project is not receiving public subsidies. Due to its location in the south of Great Britain, the Project is reducing need to make investments into the energy distribution network and will thus help to reduce green levies required to finance infrastructure improvements for connecting northern power plants with southern power consumption. As the land is leased, there is not value gain for the project from such increases, if any.</p>	Funding and PPA
REP1-133	Bojan Ivanovic	8. Lack of Accountability and Transparency <ul style="list-style-type: none"> Opaque Corporate Structures and Offshore Interests Legal Entities Used to Conceal Profit Chains 	<p>The corporate structure has been duly disclosed by the Applicant and been made transparent in the Funding Statement. SolarFive Ltd is a standard UK limited company which will be subject to UK Corporate Tax with its entire income. Profit distributions will be taxed in compliance with applicable UK laws and regulations. Also, the beneficial ownership for companies is publicly available in the "People with Significant Control" register. It can be</p>	Funding and PPA

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<ul style="list-style-type: none"> Superficial Environmental Assessments and Data Gaps 	<p>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.</p>	
REP1-133	Bojan Ivanovic	<p>3. Environmental and Flood Risk Concerns</p> <ul style="list-style-type: none"> Existing Flood Risk Already Documented Increased Surface Runoff from Proposed Development Destruction of Natural Water Absorption by Farmland Poor Drainage Infrastructure Aggravates Risk 	<p>We note the existing flood risk at the site and the surrounding areas, which has been noted from available flood risk data in 6.5 ES - Appendix 10.1 Flood Risk Assessment [APP-166].</p> <p>A Detailed Surface Water Strategy will be submitted prior to construction, detailing how surface water runoff will be contained to the 100-year plus climate change events. Initial calculations in 6.5 ES - Appendix 10.2 Conceptual Drainage Strategy [APP-167] show how the proposed attenuation methods, primarily gravel subbases can accommodate the 100-year-plus climate change event.</p> <p>We note the concern regarding the destruction of natural water absorption by farmland through the development of the solar farm. 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.</p> <p>Drainage infrastructure is proposed to mimic the natural environment where possible, to avoid installing large piped features across the site. The drainage is designed in accordance with NPS EN-1, the NPPF and associated PPG, SuDS Manual (CIRIA 2015) and associated Local Plans. The final detailed drainage design will be designed in correspondence with the Lead Local Flood Authority; Oxfordshire County Council.</p>	Hydrology and Flood risk
REP1-133	Bojan Ivanovic	<p>1. Flawed Consultation Process</p> <ul style="list-style-type: none"> Manipulation of NSIP Classification for Private Gain since Non-Contiguous Land Parcels Aggregated Illegitimately No Legal Justification for National Infrastructure Status- Developer-Led Process Lacks Transparency and Integrity Deliberate Exhaustion and Marginalisation of Local Opposition Bias Within the Inspection Framework Government-Led Intimidation and Dismissal of Objectors Ignored Impact on Property Values/ No Assessment of Visual Pollution on House Prices 	<p>A DCO is required for the Project as it falls within the definition and thresholds for a Nationally Significant Infrastructure Project (NSIP) under sections 14(1) and 15 of the Planning Act 2008 (PA 2008). This is because it consists of a generating station with a gross electrical output capacity exceeding 50 MW. Section 103 of the Planning Act 2008 then confirms that the Secretary of State has the function of deciding an application for an order granting development consent.</p> <p>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].</p> <p>An assessment of the impact of the development on house prices was scoped out of the socio-economic assessment as it was agreed any impact would not be significant.</p>	Consultation Process
REP1-133	Bojan Ivanovic	<p>4. Community Representation and Legitimacy</p> <ul style="list-style-type: none"> Unauthorised Advocacy by Conflicted Community Groups Sustainable Woodstock's Affiliations Undermine Credibility Only Democratically Elected Parishes Represent the Community 	<p>The Applicant's SoCC set out a range of methods to support an accessible and inclusive pre-application consultation. This included multiple prescribed statutory consultees, and non-prescribed consultees including gateway organisations representing potentially seldom heard groups and other community and interest groups. Appendix 030 details the prescribed and non-prescribed statutory consultees [APP-030].</p> <p>The Consultation Report [APP-024] provides details of the consultation process.</p> <p>Furthermore, the Applicant has worked closely 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 the LPAs, for agreement as part of the examination.</p> <p>The Applicant's approach to consultation and engagement, including the consideration of feedback received, is described in the Consultation Report [APP-024].</p>	Consultation Process
REP1-133	Bojan Ivanovic	<p>National vs Local Interests</p> <ul style="list-style-type: none"> No Genuine National Significance Project Sited Far from Energy Users Better Alternatives Ignored for Developer Profit 	<p>The IP appears to be questioning Government policy in terms of the status of such projects (NSIP under the Planning Act 2008) and so the Applicant chooses not to address this as it is beyond the scope of the Examination process. The IP also suggests the Applicant should be advancing rooftop and/or brownfield sites which are in much closer proximity to large scale energy users.</p> <p>In response, the Applicant supports the development of rooftop solar or renewable energy projects on brownfield sites. Brownfield sites were considered but not available or at the right scale needed for the Applicant.</p> <p>Solar panels on roofs are an important contributor, as recognised in the Government's British Energy Strategy, but will not in their own right provide sufficient energy generation, even if they can be connected to the grid or provide a local 'private wire' connection to a local off-taker. The target for solar ground-mounted energy will continue to be a significant part of the renewable development mix in order to meet targets.</p> <p>The Site Selection and Alternatives are considered within ES Volume 1, Chapter 5: Alternatives Considered [APP-042]. References to scale can be found at para 5.5.7, and Table 5.1, page 13 and 17.</p>	Alternatives and Roofs

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			<p>See also Planning Supporting Statement [REP1-012] paras. 2.23, 3.5.6 and Annex 1 Table 1 NPS EN-1 Compliance Table, page 50, para ref 3.3.12.</p> <p>In terms of need, the Planning Supporting Statement (PSS), para 2.1.4 sets out the basis for need for solar farms and other forms of low carbon energy infrastructure. The need for all these types of [energy] infrastructure is established by NPS EN-1 [paragraphs 3.3.61 to 3.3.63] and a combination of many or all of them is urgently required both for energy security and Net Zero. Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. The urgent need for CNP infrastructure to achieving our energy objectives, together with national security, economic, commercial and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.</p>	
REP1-133	Bojan Ivanovic	<p>6. Misuse of Green Belt Land</p> <ul style="list-style-type: none"> • Botley West Represents Permanent Industrialisation • Unjustified Claims of 'Very Special Circumstances' • Death by a Thousand Cuts: Erosion of the Green Belt • The "Grey Belt" Rebranding Is Deceptive 	<p>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.</p> <p>The development is not permanent, and as such would not fall to be considered as grey belt in the Applicants view.</p>	Green Belt
REP1-136	Councillor Dan Levy	<p>Mr Wallis asked yesterday if I could send details of Salt Cross.</p> <p>There is much information at Salt Cross Garden Village - West Oxfordshire District Council. You will also find the link to the report by the Planning Inspectorate on the Area Action Plan, from which you can deduce that the village is almost certain to be built.</p> <p>Salt Cross will comprise the whole area north of the A40 at Eynsham, for approximately 2km northwards.</p> <p>The highest point of Salt Cross, looking across to the Evenlode Valley section of proposed Solar Farm, has co-ordinates: 51.790830, -1.383669 51.792251, -1.384014.</p> <p>This is on a public Right of Way. I would be pleased to accompany the inspectors if they wish. I would be grateful if you could acknowledge receipt of this email, and if you could let me know if you would like further information from me (or WODC) about this aspect of the local area.</p>	<p>The Applicant notes the update provided by Cllr Levy to the ExA.</p> <p>To confirm to the ExA, 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.</p> <p>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.</p> <p>Lead officers at WODC and OCC were consulted in the Applicant's development of Tier 3, 2 and 1 schemes identified for the Cumulative Effects Assessment, 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.</p>	Acknowledgement
REP1-138	David Beaumont	Resident stating issue with development, proposing increased buffer zones, LVIA issue but touches on Noise and Ecology.	<p>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 & APP-105], and ES Volume 3 (Appendices) [APP-211 to 213].</p> <p>This assessment has identified that the development will not cause any significant adverse effects on noise and vibration sensitive receptors. This assessment includes a consideration of noise from construction vehicles.</p> <p>During the construction and decommissioning phases, noise and vibration will be controlled and limited by the Outline Code of Construction Practice [APP-232 & APP-233] (CoCP). This will ensure that no resident experiences a significant adverse effect. The CoCP includes construction phase noise limits, and construction times.</p>	Noise and Vibration Impact
REP1-138	David Beaumont	<p>Resident stating issue with development, proposing increased buffer zones, LVIA issue but touches on Noise and Ecology.</p> <p>My property is one of the most affected houses in the area & abuts the solar field section 2.28 on the proposed plan. Currently the buffer zones around Bladon range from 25m-80m. An earlier statement from the developers has allowed me a 45m BZ which is totally inadequate & random. They have offered in mitigation to provide some landscaping & planting which will take years to grow & will never hide the wonderful aspects we currently enjoy The visual amenity to those affected properties, & especially mine, will be totally compromised.</p> <p>I therefore propose that Buffer Zones for the Botley West sites, in accordance with international agreements is to be set at a minimum of 500m from any domestic boundary. With this particular application it would only take out less than 2% of the total area. I imagine their contingency would undoubtedly be up to the margins of 10%, so well within a competent business plan.</p>	Please refer to the Applicant's response to REP1-097 in [EN010147/APP/12.4] in respect of buffer zones.	Landscape and Visual Impacts
REP1-139	David Foster	REP1-139 predominantly discusses a petition to increase buffer zones to 275m for Grove Road and Orchard Field Lane, Bladon Residents.	Please refer to the Applicant's response to REP1-097 in [EN010147/APP/12.4] in respect of buffer zones.	Landscape and Visual Impacts

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		<p>If the Botley West Solar Farm is to progress, there needs to be a substantial change to the proposal. There needs to be a substantial increase to the buffer zones for properties who back directly onto the proposed Solar Farm. The current proposal seems to vary considerably (for my area of Grove Road, Bladon, only has an 85m buffer zone and 25m elsewhere) and is not acceptable considering the size of the proposed development. Each property affected by the solar farm needs to be assessed but a Buffer Zone of 500m to cover all properties facing directly onto the solar farm should be considered based on solar farm research.</p> <p>Grove Road and Orchard Field residents are some of the most impacted on the proposed scheme and therefore ardently request government and PVDP consider a suitable buffer zone from the Botley West Solar Farm. I have a signed petition for Grove Road and Orchard Field residents whose house is facing the solar farm, for a buffer zone of 275 meters (Appendix 1). This is based on the local layout and draws a line up to the current path crossing the field.</p> <p>We believe this increased buffer zone reduces risks to local biodiversity and reduces the day to day visual impact on residents. It will also reduce some of the impact of construction. It aims to maintain our residential quality of life. However, feedback from the petition wanted the 275m increased to 500m based on the greater biodiversity, minimising animal migration, repositioning of footpaths and heavier use of these buffer zones due to limitations of local walks caused by the solar farm. An increase in the buffer zones to 500m for properties facing the solar farm will have little impact on the scale of the 2,471 acres proposed by PVDP, and supports the overall view that the current development is too large for its environment.</p>		
REP1-140	David Sherratt	Summary - Querying the calculations from ALC chapter estimating BMV land percentage the site occupies, Appendix supporting David Sharratts own calculations	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.	Agricultural Land Use
REP1-143	Dustin Sean Dryden	<p>QUESTION 2: Funding?</p> <p>How will the Examining Authority ensure that the Examining Process thoroughly scrutinises the financial standing of the funding streams assertions by the Applicants in their Funding Statement? Reasonable due diligence?</p> <p>Given the significant concerns regarding the funding of this proposal which the media have linked to Russian investments - and which plainly involves a complex and opaque network of associated shell companies, how will the Examining Authority ensure that Botley West is not a 'zombie project' to use the current Secretary of State's words?</p> <p>DESNZ has indicated that adopting a strategic and planned approach will eliminate the need for billions of pounds spent on unnecessary grid reinforcement. Energy secretary Ed Miliband added that the changes "will axe 'zombie' projects and fast-track connections for homegrown power". Botley West would not be home grown power; it is a land grab benefitting obscure overseas interests.</p>	<p>Zombie projects are speculative plans that are not viable because they do not have for example land rights or financing but still hold a place in the connection queue. The Project has a high degree of certainty that it will proceed, subject to securing a DCO. The Applicant has spent significant funds on the development and has entered into lease agreements with landowners.</p> <p>Thus, Botley-West is no "Zombie Project". Financial information provided in the Funding Statement is based on Financial Statements (https://find-and-update.company-information.service.gov.uk/company/12602740), duly disclosed under UK law. Further the applicant has a fully transparent ownership structure, that is publicly disclosed.</p> <p>The applicant is not aware of any media reports on alleged links to 'Russian' funding, except from Private Eye, which by the nature of it and the information provided appears to be a sponsored campaign to inflict harm on the project.</p>	Funding and PPA
REP1-143	Dustin Sean Dryden	<p>QUESTION 3: CREDIBILITY?</p> <p>In the Land & Rights Negotiations Tracker document the Applicants inform the Examining Authority that all individuals affected, as listed in the Book of Reference, have been approached for negotiations.</p> <p>Mr. Dryden's significant interests are indeed mentioned in several parts of the Book of Reference. However, there have been no approaches made to him by the Applicant, which raises questions about the credibility of the Applicants' assurances or claims. How will the Examining Authority ensure that the Examination Process will facilitate substantive scrutiny of the Applicant's claims made regarding land negotiations?</p>	<p>As set out in the Applicant's Written Summary of Oral Submissions at the Open Floor Hearings (OFH1 & OFH2) [REP1-018], Dustin Dryden is included in the Book of Reference [REP1-010] as a subsoil owner in respect of one plot (8-29) along the cable routes proposed to run beneath the public highway, and also in relation to Category 2 rights over plots (8-27, 8-31, 8-32, 10-02, 10-07 and 10-12) affecting neighbouring land adjacent to his registered title(s).</p> <p>The Land and Rights Negotiations Tracker [REP1-008] contains details of negotiations with all freeholders of land that fall within the Order Limits and are required for the delivery of the Project. As Mr Dryden does not have a freehold interest in land within the Order Limits, and no infrastructure—such as solar panels, cables, construction access, haul roads, compounds, or other temporary uses—is proposed on his land, it is intentionally not included in the tracker.</p> <p>Notwithstanding this, the Applicant did engage with Mr Dryden through sending of a Land Interest Questionnaire during the contact land referencing phase of the diligent enquiry and non-intrusive survey request letters to request access for ecological surveys, specifically in relation to Great Crested Newt (GCN) habitat assessments. Mr Dryden received statutory consultation correspondence including S42 letter, Targeted Consultation letter and S56 letter and was further engaged in relation to survey access as noted above. This confirms that the Applicant has fulfilled its duty to consult Mr Dryden on the proposals and has provided appropriate opportunities for feedback. Additional discussions have also taken place between members of the Project team and Mr Dryden, which have contributed to the Applicant's understanding of his interests and concerns. For example, the Applicant is aware</p>	Land Agreements

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			that Mr Dryden has an easement over a water pipe at Plot 8-27. The design of the installation area for panels has taken the water pipe into consideration.	
REP1-143	Dustin Sean Dryden	QUESTION 4: NEED? How will the Examining Authority verify the Applicants' claims that the UK Government cannot meet its Net Zero target without this project? Considering the scale and environmental impact of this project, it is important that the supporting assumptions are thoroughly fact-checked. The Applicants appear to believe that by repeating the claim frequently enough, it becomes the truth. Powerful marketing cannot be allowed to usurp accurate data analysis. We respectfully suggest that the EP should include a comprehensive (independent) review of the total number of projects already approved across the UK. If the Applicants' insistence that the need for Botley West is in fact a sham, then this Examining Authority – and the Secretary of State – must diligently ensure that the people of Oxfordshire – and the land – are not scarred for life. Unnecessarily.	The Applicant has set out the need for this development in its Planning Supporting Statement [REP1-012 and in its Supplementary Statement of Need [PDB-014] . The need for all these types of [energy] infrastructure is established by NPS EN-1 [paragraphs 3.3.61 to 3.3.63] and a combination of many or all of them is urgently required both for energy security and the binding Net Zero target established in the Climate Change Act 2008.	Needs Case
REP1-145	George David William Smith	Written summaries of oral submissions given at the Hearings during the week commencing 12 May 2025 - Newspaper Article	The Applicant notes the submission by Mr Smith of the article related to the Blenheim Weaveley Solar Park.	Acknowledgement
REP1-146	Graham Brown	I was very surprised at the comments from Oxford Airport and if they are part of the consultation why the arrangement of panels at the end of the runway had not be corrected by the developers beforehand.	The Applicant is in discussion with Oxford Airport on the matter through the SoCG.	Aviation
REP1-146	Graham Brown	Finally, I would like to write a few words about community benefit. I appreciate that community benefit is not considered in the decision-making process but would like to thank the Inspectors for listening and questioning several speakers who spoke about it at the Hearings. It is hard to believe that there is no legal requirement for community benefit for solar farms in England, especially ones of this size that will affect so many people. Botley West is so close to so many homes that if permission is granted, fair compensation must be awarded. We have supported the petition of Low Carbon Hub and are lobbying our MP, Calum Millar. He is working very hard for us in Parliament to review policy on community benefit which hopefully will bring this issue into the spotlight. I would like to remind the Inspectors that PVDP initially offered zero pounds in community benefit as they appeared to play on the lack of knowledge of local authorities and residents. Only now have they responded but with far too little in my opinion. If a system was in place for community benefit for such projects this would not be an issue and all of this petitioning, discussion and meetings would be unnecessary.	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
REP1-146	Graham Brown	This brings me on to my next point. We have consistently been told by Blenheim and the developers PVDP that the development has to be 840 MW to satisfy the agreement with the National Grid in relation to their input into the solar farm. Disappointingly the National Grid were not present at the hearing but my question is, can this amount be smaller? Can the panels be located away from the residential areas more sympathetically even if this means a reduction in the total output of the solar farm?	The Applicant has a bilateral connection agreement with National Grid Electricity Transmission to deliver 840MW electricity to the National Electricity Transmission System. Details of this can be found in the Grid Connection Statement [APP-019]	Grid Connection
REP1-146	Graham Brown	Written summaries of oral submission given at the Hearings during the week commencing 12 May 2025.	The Applicant notes the summary of response by Mr Brown to the ExA.	Acknowledgement
REP1-146	Graham Brown	I am also concerned, as are others, on the details providing the decommissioning of the development at the end of the its lifespan. What will this involve? Removal of fencing, panel supports, removal of inverter stations etc. It is very likely that PVDP will not be responsible at this stage, another very good reason for Blenheim to be overseeing the solar farm. It is mostly their land after all.	Details of the Applicant's response on the approach to a de-commissioning plan for the Project are identified in the Applicant's Response to Relevant Representations [REP1-020] at Section 11, under the sub-heading 'Decommissioning Plan'. The person with the benefit of the Development Consent Order will be responsible for adherence to Requirements including Requirement 14 which states that unless otherwise agreed with the relevant planning authority, no later than eight weeks prior to the intended date of decommissioning of any part of the authorised development' the undertaker must submit to the relevant planning authority for that part a decommissioning plan for approval.	Decommissioning
REP1-146	Graham Brown	There is a huge opportunity here for connectivity to be increased during this development. One of Sustainable Woodstock () has written in detail regarding paths and cycling possibilities and the reasons for them.	The Applicant notes this response and continues to liaise with Oxfordshire County Council regarding the provision of active travel within the Project.	Public Right of Way
REP1-146	Graham Brown	The proximity to houses and possible noise from substation inverters was a concern and not answered in full to my mind. There appears to be no legislation regarding locating solar panels next to houses (I assume it is the same as building new houses?) and for the size of the proposed development	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	Noise and Vibration Impact

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		there is a big unknown as to the noise from so many inverters in close proximity. Can this be modelled?	<p>found in Chapter 13 [APP-050], with additional information provided in ES Volume 2 (Figures) [APP-104 & 105], and ES Volume 3 (Appendices) [APP-211 to 213].</p> <p>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 noise and vibration assessment.</p> <p>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.</p>	
REP1-146	Graham Brown	I strongly believe that Blenheim should be responsible for overseeing the condition of the solar farm and not a third party company. I would go further to say it should be a requirement of the DCO. The reasons being that they are on site, they will be on site for the foreseeable future and they feel a responsibility to the community and future re-use of land.	While the Applicant proposes to enter side agreements with parties, including Blenheim Estate entities, regarding the management of land within the Order Limits, the ultimate legal responsibility to implement and comply with the requirements of the Development Consent Order fall on the Applicant. At decommissioning of the Project, land will be returned to its original land use and it will be open to the original landowner as to how it chooses to use that land moving forward.	DCO Process
REP1-146	Graham Brown	Also of concern are the paths with fencing either side through fields of solar panels. I did not hear a solution to making these safe for lone vulnerable walkers. With high fencing either side there appears to be no way of avoiding awkward situations and providing an escape route. I would very much like to bring this to the Inspectors' attention.	Please refer to the Applicant's response to REP1-120 in [EN010147/APP/12.4] .	Landscape and Visual Impacts
REP1-147	Harry St John	My impression is that the existence of one willing and large landowner (i.e. Blenheim Estate) has driven the site selection here and two other smaller owners have been understandably tempted to join the informal grouping.	<p>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:</p> <p>Factors that are noted as influencing site selection are set out in NPS EN-3, para 2.10.18 and guidance relating to the assessment and minimising adverse effects – the Applicant's assessment section of EN-3. The chronology followed and the reasons for the location is set out in Chapter 5; substation location was very important but there was no one overriding or determinative factor that drove the site selected or size. It was a combination of factors including land availability and suitability.</p> <p>In NPS EN-3, para 2.3.4, it states that</p> <p>'The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in Section 4.1 of EN-1, will not grant consent in any given case.</p> <p>At para 2.3.5, it is stated that it is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure.</p> <p>In NPS EN-3, para 2.3.9 states that as most renewable energy resources can only be developed where the resource exists and where economically feasible... and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the reuse of previously developed land).</p> <p>The Applicants approach to site selection is consistent with all relevant aspects of the NPS's. It has responded to 'preferences' in so far as the site search did include brownfield land.</p>	Needs Case
REP1-149	Harry St John	General objections based on land acquisition, overall harm and lack of benefits and profitability motives.	The Applicant notes the response by Mr St John to the ExA.	Acknowledgement
REP1-150	John Corlett	General objections about the project, in particular regarding harm to welfare of local communities.	The Applicant notes the response by Mr Corlett to the ExA.	Acknowledgement
REP1-151	John Michael Gee	Summary - Positive comment	The Applicant notes the positive comment provided by Mr Gee.	Positive comment
REP1-152	Jonathan Ford	Summary - Positive comment	The Applicant notes the positive comment provided by Mr Ford.	Positive comment
REP1-153	Michael Brown	<p>To summarise - covers same points raised in REP1-155</p> <p>ExA should please consider whether 55 viewpoints and 31 photomontages are of sufficient quality and in sufficient number to provide enough information so the impact of the project can be understood by anyone looking at it. If not then I am also asking for a direction that further photographs and photomontages of the right quality should be provided.</p> <p>A full set of photographs and photomontages of the right quality is required to enable all of us to reach an informed view of the true landscape and visual impact.</p>	Please refer to the Applicant's response to REP1-15 5 in [EN010147/APP/12.4] .	Landscape and Visual Impacts
REP1-154	Michael Brown	To summarise - covers same points raised in REP1-155	Please refer to the Applicant's response to REP1-155 in [EN010147/APP/12.4] .	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		Inadequate assessments, and factors leading to significant under assessments in the LVIA in the ES Chapter 8 (APP-045 for the Central site – paragraphs 8.9.178 – 8.9.231).		
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
REP1-157	Michael Field	Does the proposal support grid forming? Is there sufficient reactive power provision to satisfy the examiners' anticipated future grid Power Factor? Is a fast-response battery unit included to handle unscheduled load changes on the grid due to demand peaks, outages and HV short circuits?	The Applicant will be expected to abide by the Construction and Use of System Code applied by NGET – this includes a requirement to provide reactive power to the NETS. The scheme does not include any battery storage, though there is a 250MW LDES BESS with a connection agreement at the Farmoor NGET substation.	Grid Connection
REP1-158	Michael Field	Comments on the Schedules contained within the DCO in regard to the commencement of power generation and timeliness.	The Applicant notes the written submissions by Mr Field in relation to the DCO Schedules.	Acknowledgement
REP1-159	Michael Field	Comments in regard to the track-record and experience of PVDP and its employees in delivering ground-mounted solar projects.	The Applicant notes the written submissions by Mr Field in relation to the background, experience and track-record. The Applicant's responses on these points are set out in the Applicant's Responses to Relevant Representations [REP1-020] , in Section 39 of that document.	Acknowledgement
REP1-164	Professor David J Rogers	Summary email - to be sure other emails received. Response linked with REP1-165.	The Applicant notes the response by Professor Rogers to the ExA.	Acknowledgement
REP1-165	Professor David J Rogers	Impact on house value: The developers quote only one author, Stephen Jarvis to support their claim that the Botley West Solar Farm will have no impact on local house values. There is an extensive body of literature on the impact of solar installations on house values and these were reviewed in a SolarQ document that was given to the developers during one of the consultation meetings. The SolarQ document found a number of examples from America where, indeed, no such impact on house values was found, if anything a slight increase in house values in some cases. Most of these studies were, however, carried out by Estate Agents (realtors) and the results were not analysed scientifically. Re-analysis of some of the results showed the opposite effect – a decrease in house values near to solar farms. There were also numerous examples where negative impacts on house values were found. More fine-grained analysis does reveal an effect of solar installations on house values, and this effect is larger the larger the solar installation and the nearer any house is to it. This externality of the BWSF proposal should be acknowledged by the developer and cannot simply be ignored.	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
REP1-166	Professor David J Rogers	Aviation safety <ul style="list-style-type: none"> Thermals arising from large expanses of solar panels: solar panels create thermals that may affect light aircraft taking off or landing at Kidlington airport Glint and glare effects on aircraft: glint and glare from any nearby BWSF solar panels would affect pilots of aircraft taking off and landing at Kidlington. Bird strike and the 'Lake Effect Hypothesis': possibility of birds striking solar panels. Birds thus affected may be confused and create hazards for landing aircraft.	The Applicant is in discussion with Oxford Airport on the matter of thermal turbulence through the SoCG.	Aviation
REP1-166	Professor David J Rogers	Anti-reflective coating for solar glare: Anti-Reflective Coatings (ARCs) have been suggested as a way of reducing glare from PV panels, but they do not necessarily reduce polarised light from them ¹¹ . The 'AR' in ARC refers to the reflection from the surface of the PV panel itself, not the origin and type of the light that reaches it.	The Glint and Glare Assessment considers effects toward aviation receptors. Pager Power is aware of technical issues relating to Glint and Glare from solar farms in the vicinity of aerodromes but has assessed the Botley West Solar Farm on its own merits and no significant impacts are predicted towards aviation receptors.	Glint and Glare
REP1-166	Professor David J Rogers	Bird strike and lake effect hypothesis During this ISH and elsewhere mention was made of the possibility of birds striking solar panels. Birds thus affected may be confused and create hazards for landing aircraft. Certainly, dead birds are found within solar installations, and various American studies conclude that water birds may be especially prone to crash land into solar arrays, leading to the "Lake Effect Hypothesis" that they have mistaken the solar panels for reflective water surfaces. Many water birds are heavily bodied and slow flying and so pose a particular danger	The impacts of birds colliding with solar panels, having mistaken them for water (the 'lake effect') are assessed within ES Volume 1, Chapter 9, Section 9.9 [PDB-008] . A review of the impact of solar farms on birds by Natural England (2017) concluded that there is no scientific evidence of collision risk associated with solar PV arrays and the risk of collision with solar panels is likely to be very low but not impossible. This evidence was relied upon by the applicant of the 360ha Cleve Hill Solar Farm NSIP in north Kent, a site that sits directly adjacent to the Swale Special Protection Area (SPA), i.e. in a far more sensitive location with respect to birds than the Botley West Solar Farm. It was also accepted by Natural England, PINS and the Secretary of State at the time that scheme was consented.	Local Ecology and Nature

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		to any sort of aircraft. During ISH1 the developers dismissed the Lake Effect Hypothesis as having little or no observational support. No evidence was presented for their conclusion	<p>Research in the United States found some evidence that suggested such an effect could occur but the particular circumstances of that work (solar in desert locations with no water in the surrounding landscape) are not directly applicable to those in the UK where water bodies are frequent.</p> <p>Solar sites within the UK are also very well studied with respect to their bird populations, for example by Solar UK and the University of Lancaster studying 124 active solar sites across the UK. No evidence has been published from this work or others demonstrating that there was any significant risk of collision. Indeed, most research found that solar sites are beneficial for bird species in general when managed for wildlife (e.g. Copping <i>et al.</i> 2025).</p> <p>In addition, one of the mechanisms put forward for why a lake effect might occur relates to how solar panels reflect light (polarised light, in particular). Water has an albedo of between 3 and 8% of incident light which is similar to that of glass and panels covered with glass; such panels would reflect similar amounts of light and there is therefore a mechanism by which a lake effect may operate (not withstanding that such an impact has not been demonstrated in a UK setting). However, the panels the Project would use are covered with a specific anti-reflection coating that reflects circa 0.5-1.5% of light. They would therefore appear far darker than any surrounding water and would not exhibit the variations in reflection that a water surface would have; they do not move like water does (a lake's surface will always be in motion due to wind except on very still days). So side by side, solar panels and a lake would look very different in the UK where days without wind are few.</p>	
REP1-167	Professor David J Rogers	Land rights: The significant powers of compulsory purchase of the NSIP scheme appear to be being used by developers to acquire land freehold, for no obvious reason. This land-grab will permanently take out of production the farmland involved. It is unlikely ever to be used for growing food again and is likely to be re-classified as 'previously developed land' and used for other, more profitable purposes such as housing. The freehold of land within any solar scheme also makes the entire scheme more attractive to takeover by other companies and international venture capitalists who will have as little concern for the UK's Net Zero plans as for producing food for the nation to eat. More than 88% of all the land of the 17 'freehold' NSIP proposals is in Agricultural Land Class (ALC) Grades 1, 2 or 3 – a category that includes Best and Most Versatile (BMV) land, the most ideal for agriculture. Climate change is likely to reduce significantly the extent of the UK's BMV land. We should preserve as much as possible for future generations to thrive on our small, crowded island.	<p>The Statement of Reasons [AS-015] sets out justification for the compulsory purchase powers being sought.</p> <p>The Applicant has been seeking to acquire the relevant freehold interests and other rights over land required by agreement, in order to allow for the construction, operation and decommissioning of the Project. To confirm, agreements with all of the freehold landowners have been secured in relation to the main site.</p> <p>Discussions with the other relevant landowners are ongoing, with good progress made in relation to securing voluntary agreements over the Order land (see the Land and Rights Negotiations Tracker, updated at Deadline 2). The Applicant will continue to endeavour to acquire the land, rights and other interests by agreement wherever possible. This approach of making the application for powers of compulsory acquisition in the Application and, in parallel, conducting negotiations to acquire land by agreement, accords with paragraph 26 of the Guidance.</p> <p>To be clear, compulsory acquisition powers are sought only as a fallback mechanism, to be used in circumstances where voluntary agreements cannot be secured or where land interests remain unknown or unregistered following due diligence and land referencing. This is a standard and accepted approach across Development Consent Order applications, including the vast majority of recent solar DCOs. Further justification is set out in the Statement of Reasons [AS-015].</p>	Land Agreements
REP1-168	Professor David J Rogers	<p>The areas of all developments within the green belt were calculated by a Geographical Information system (ESRI's ArcGIS), restricted to three different limits a) the entire green belt (top map), b) areas within 2kms of the built-up areas shown in grey on the maps (middle map) and c) areas within 1km of the built-up areas (lower map). For b) and c) the limits of the 2 or 1km buffers around the urban areas are shown by the green and purple 'bubbles' respectively. The areas of development are expressed as percentages of the total area involved in the small tables next to the maps.</p> <p>If all the developments go ahead, by 2050 Oxford will have lost 15.5% of its entire 349sq. kms green belt. That total is made up of Local Plan sites (3.5%), Oxon 2050 sites (8.9%) and BWSF (3.1%) (upper map).</p> <p>Within 2kms of urban areas, the land loss rises to 23.2% (middle map on the last page here) and within 1km to 25.9% (lower map). Since the areas closest to urban sites are those most likely to be visited by walkers and cyclists from the city, the loss of over a quarter of green belt land by 2050 should be a matter of major concern. BWSF would contribute significantly to these cumulative losses – just under 20% of the total loss in the 1km case but almost 30% in the 2km case.</p> <p>Use of the green belt for housing is controversial and often justified on the grounds that it provides building sites close to the city where nurses, teachers, fire personnel etc, can live less expensively than in the city itself. This is something of a myth in Oxford where many green belt sites are being used for executive housing for London commuters (easy access to London was a major selling point for houses in the Barton Park development to the east of the city). 76% of BWSF's entire area is within Oxford's green belt. This is an unnecessary use of a scarce resource that should be for the health and welfare of all of the city's inhabitants. The health benefits of green spaces are now well-established. There is certainly no health gain in taking away a large portion of the city's green belt for a solar installation.</p>	<p>The Applicant notes the IP's assessment of land likely to be lost to green belt as a result of new housing. The App19icnat notes it includes proposed solar farm as contributing to that 'loss'.</p> <p>However, the Applicant respectively points out that housing development will indeed result in a permanent loss of Green Belt, whereas the solar farm will allow the Green Belt (and indeed agricultural use) to endure. The Project is temporary and reversible, unlike the housing schemes to which the IP refers.</p> <p>The Oxfordshire Green Belt in total occupies an area of approximately 34,464 ha. The above ground development of the Project occupies an area of approximately 497 ha. or 1.4% of the total Oxfordshire Green Belt and it is temporary and reversible.</p>	Green Belt

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP1-169	Professor David J Rogers	In determining the planning balance, and whether or not the 'exceptional circumstances' of Net Zero over-ride Green Belt protection or the preservation of productive farmland in our rural landscape, I would ask the Inspectorate to consider the cumulative impact of sub-NSIP and NSIP scale solar both nationally and locally. If the proposed Botley West Solar Farm is approved, it would contribute to nationwide over-shoot of the 2030 Net Zero targets and result in more than three times overcapacity of Oxfordshire's own renewable target.	<p>The assessment of cumulative effects is contained in ES Chapter 20 – Cumulative Effects and Inter-relationships [APP-057]. This assessment includes other solar farm projects, cumulatively, which were provided for consideration in consultation with the host authorities, as well as other major developments in the vicinity of the Project.</p> <p>The 'very special circumstances' that are applied to the test of development in the Green Belt are considered in detail in Appendix 8 to the Planning Supporting Statement [REP1-012] and have been further supplemented by the Applicant's response to Relevant Representations and the ExA's first written questions. This includes consideration of the overall need for, and pace of delivery of, solar developments as part of the pressing response to the UK and Oxfordshire's renewable targets, and the weight accorded in NPS EN-1 to Critical National Priority projects.</p>	Cumulative Impacts
REP1-173	Roderick Cooke	I live on the Lower Road on the north western edge of the Central Section of the solar farm. Incidentally the house and mill are 300 years old, listed grade 2, mentioned in the Domesday Book but not listed as a heritage asset in the applicant's submission.	The detailed assessment of likely impacts and effects on the Grade II listed Mill Farmhouse and associated mill are presented within paragraphs 1.9.72 - 1.9.76 of ES Appendix 7.5: Settings Assessment [APP-142] , with further details provided in the Revision 1 version of this document which was submitted at Deadline 2 [EN010147/APP/6.5] .	Historic Environment
REP1-173	Roderick Cooke	<p>My main concern is with the loss of visual amenity and the number of people affected.</p> <p>Firstly, because of the steeply rising ground to the East of the Evenlode, the solar panels will be visible from a considerable distance.</p> <p>Secondly, it will be visible to the large number of vehicles passing down Lower Road each day and to the passengers on the 3 cathedrals line from Oxford to Worcester and Hereford. It will also be visible to the proposed bicycle track along Lower Road which is promised with the proposed Salt Cross new town. Effectively any resident of any of the villages surrounding the solar farm will be passing through this semi industrialised landscape whenever going to another village for shopping, taking children to school etc,. This is in contrast to the completely rural landscape that exists at the moment.</p> <p>In summary then, I suggest this solar farm is far more visible to far more people than other large solar farms and that therefore the deleterious effect on visual amenity should be given considerable weight by the inspectors.</p>	Please refer to the Applicant's response to REP1-120 in [EN010147/APP/12.4] .	Landscape and Visual Impacts
REP1-173	Roderick Cooke	As an aside, the land in this area is also part of the Oxford Green Belt and of excellent agricultural quality being grade 2 or grade 3a. It is worth mentioning in response to another oral representation which suggested the land was of poor quality and that yield had dropped by 25% over the last 2 years that, of the 2 main farmers in this area, David Henman and Michael Cook. The land is just as high yielding now as it has in the past.	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.	Green Belt
REP1-175	Rosemary Lewis	<p>NOISE.</p> <p>I believe that the impact of Noise both during construction and operation has been underestimated in the Applicant's assessment. Impacts of Construction noise are dismissed by the Applicant as temporary and short-lived. In paragraph 13.9.11 they state "pile driving has the potential to cause some noise and vibration audible outside of the project site boundary however the pile driving will occur for a short period of time next to any one receptor"</p> <p>I can find no justification for this conclusion in the Environmental Statement. Pile driving in an unbroken area of 500 hectares will cause severe noise pollution for each receptor for longer and at a much greater distance than predicted by the Applicant. It is well known in Church Hanborough that noises from Blenheim events 4km away can frequently be heard quite clearly.</p> <p>Given the scale and topology of the central area, hammering will reverberate throughout the Evenlode Valley impacting properties in Church Hanborough, Bladon, Begbroke and Cassington. A notable concern is the loss of peace and tranquillity in Bladon Churchyard containing the much visited Churchill's grave. The noise will be heard in a number of Schools - unsettling for vulnerable children and is also likely to reach the ears of visitors to Blenheim Palace.</p> <p>All these concerns extend into the Operational phase too. The ES states that Power Converter Stations (PCS) will emit 92dB. There are 156 PCS throughout the site, some are placed in pairs, many are within 100m of properties and as close as 5m to PROW and yet the impact is universally assessed as negligible and cumulative impacts have not been considered. During the construction phase, there has been no assessment of noise impacts on residential receptors. During the operational stage some dwellings</p>	<p>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.</p> <p>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. Noise from construction activities is not comparable to that from events at Blenheim Palace, and so it is not appropriate to make a comparison of the two.</p> <p>The noise and vibration assessment includes results from the computational noise model SoundPLAN. This computer noise model includes the topography of the development site, and surrounding area. The computational noise model assumes down-wind noise propagation for all receptors, and so is considered to be a reasonable worst-case. The assessment identifies no significant adverse effects at any receptors which are closer to the site than either Blenheim Palace, Sir Winston Churchill's grave, or the surrounding schools. As a result, no significant adverse effect are expected at any other receptor.</p> <p>As has been stated above, 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. The receptors which have been assessed have been selected to provide a reasonable worst-case assessment, and are equally representative of other surrounding receptors, as is detailed in this response.</p> <p>In summary, the noise and vibration assessment in ES Chapter 13 - Noise and Vibration [APP-050] fully considers the potential noise and vibration impact of the Proposed Development at receptors and shows that the development avoids any significant adverse effects.</p>	Noise and Vibration Impact

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>have been assessed for noise but how the Applicant arrived at the very limited number of these has not explained [in EN010147/APP/6.3 Table 13.26], nor why they omitted so many sensitive receptors including several schools and a Crematorium.</p> <p>In summary: No Residential Amenity assessment has been carried out on either traffic or noise - or indeed on visual amenity. I hope the Inspectors will consider these issues fully in the examination.</p>		
REP1-175	Rosemary Lewis	<p>TRAFFIC.</p> <p>I believe the issue of heavy traffic and congestion in this area has not been adequately assessed by the Applicant and would draw the Inspector's attention to the following facts drawn from local knowledge, daily use and actual observations of local roads (ref map) 1. At the junction between A4095 and Lower Rd (black circle) traffic frequently queues for 500m as far as the low narrow railway bridge (black hoop) which is too narrow for a lorry to pass a car and unsuitable for large HGVs or AILs. The queue restricts access into the prestigious Wolfram Institute and other businesses near the junction. More traffic turning onto Lower Rd to access the fields of solar panels will further delay the traffic trying to turn out.</p> <p>2. To avoid the queues, cars would cut through Church Hanborough, an unsuitable alternative as the road is narrow and winds through the village where there is no pavement, no lighting and many properties adjacent to the road.</p> <p>3. The Applicant is proposing 7 additional access points to the site from Lower Road. These will be added to the many tracks and property driveways, the turn to City Farm hamlet and the busy junction with Church Road. (17 turn offs in purple).</p> <p>4. Lower Road has no speed limit and contains long straight stretches but also has bends and contour changes restricting sight lines in places.</p> <p>5. The Applicant's new public access path to run alongside Lower Rd and to cross it twice is a dangerous proposal.</p> <p>6. The A4095 itself is unsuitable for construction traffic because it passes directly through Long Hanborough and Bladon where it is narrow and winding causing a serious hazard to pedestrians.</p> <p>A safer access route to the site in this area would be from the A40 roundabout approaching Lower Rd from the south as this passes just 4 of the 17 turn offs to reach the proposed substation and fields beyond. Please will the Inspector examine whether the Applicant has fully considered the impact on residents and other road users of its plans?</p>	<p>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 Lower 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.</p> <p>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.</p> <p>As part of this access strategy, construction HGVs delivering day-to-day materials will not travel along the A4095 through Bladon or Long Hanborough.</p> <p>The Applicant notes the suggested route of travelling from the south via the A40 roundabout onto Lower Road. The Applicant confirms this is the proposed access route that forms the access strategy, as set out in section 12.7 of ES Volume 1, Chapter 12 [APP-049] and Appendix 12.6 Construction Vehicle Trip Generation Assumptions [APP-204].</p> <p>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].</p>	Traffic_Transport_and_Access
REP1-182	Tim Sumner	Written Summary of oral presentation given to the Preliminary Meeting in relation to the ownership of the Blenheim Estate and the rights of the Crown.	<p>The Applicant's response to this point is set out in paragraphs 1.3.8 to 1.3.10 of the Applicant's Written Summary of Oral Submissions at the Open Floor Hearings [REP1-018]. The Applicant's response in that document is intentionally focussed on 'Crown Land' as defined under the Planning Act 2008.</p> <p>The Written Summary of Oral Submissions provided by Blenheim Palace, to Deadline 1 [REP1-098], states that; <i>"All land proposed for the scheme sits outside the Park (so the land proposed is not owned by the charity) and is promoted by the commercial businesses on unincumbered freehold land owned by either the Blenheim Palace 1984 Maintenance Fund or the Vanbrugh Unit Trust. Options and leases are in place today formalising the arrangements between the developer and landowner. There are no Crown rights or outstanding mortgages.."</i></p>	Acknowledgement
REP1-183	Tom Lewis	Additional information linked to Number 3 of REP1-186.	The Applicant notes the supplementary information on the WHS Setting Study provided by Mr Lewis to the ExA.	Acknowledgement
REP1-184	Tom Lewis	Additional information linked to Number 3 of REP1-186.	The Applicant notes the supplementary information on the WHS Revised Management plan provided by Mr Lewis to the ExA.	Acknowledgement
REP1-185	Tom Lewis	Additional information linked to Number 3 of REP1-186.	The Applicant notes the Written Summary of Mr Lewis's oral submission to the Open Floor Hearing Session 2, as presented to the ExA.	Acknowledgement
REP1-186	Tom Lewis	Number 1 - The Developer, in the DCO has not provided a justification for the significant adverse impact it will have on Public Rights of Way throughout the area, and that the proposed mitigation is inadequate.	The Applicant has considered the effects of the project on the connectivity of the network of Public Rights of Way and these are assessed in Volume 1, Chapter 17: Agricultural Land Use and Public Rights of Way (APP-054) and measures for the management of the PRoW during the construction phase of the Project are contained in the outline Public Rights of Way Management Plan (APP-232) which is secured by Requirement 11 of the Draft DCO.	Public_Right_of_Way
REP1-186	Tom Lewis	Number 3 - Will not the development have a severe impact on the setting of Blenheim Palace, particularly as all of the land involved in the scheme is to be the subject to a Compulsory Purchase Order (Book of Reference (Ref 4)) and	<p>The Applicant does not consider there will be a 'sever' impact upon the Blenheim Palace WHS.</p> <p>In respect of CA, the Applicant can give comfort that the compulsory acquisition powers are sought only as a fallback mechanism, to be used in circumstances where voluntary agreements cannot be secured or where land</p>	World Heritage

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		its future would then not be under Blenheim's stewardship during and after decommissioning in 42 years' time? Contrary to what we heard yesterday from the Dominic Hare, although not revealed on whose behalf he was speaking, (the private Blenheim Estate or the Blenheim Palace Heritage Foundation -the charity). If the land is Compulsorily Purchased by the Developer, then neither part of 'Blenheim' will not be entitled to any rent from the land. It is curious that Mr Hare is the CEO and as a Trustee of the Blenheim Palace Heritage Foundation and also in the management of another 'Blenheim' company or Trust that owns the land on where the solar panels will be sited. Over one year ago my colleague wrote to the independent Trustees of the BHF to elicit their response to BWSF. They would not reply directly and so far have refused to endorse or criticize the project, however I understand that the current Duke of Marlborough, through his role on Woodstock Town Council is on record in opposing BWSF.	interests remain unknown or unregistered following due diligence and land referencing. As a voluntary agreement has been met with Blenheim, it is not expected that CA powers will need to be relied upon, although it is necessary to seek them still in case of a breach of that voluntary agreement. This is a standard and accepted approach across Development Consent Order applications, including the vast majority of recent solar DCOs. The Applicant's full case on this matter is set out in the Statement of Reasons [AS-015] , The other points raised by the IP are in the opinion of the Applicant matters for Blenheim to respond to (see also REP1-098).	
REP1-186	Tom Lewis	Number 2 - The co-developers have not answered why alternatives to the current scheme have not been investigated.	Please see the response to REP1-147 above.	Alternatives and Roofs
REP1-187	Tom Lewis	Effects of biodiversity (source 6) On the negative side, the small size of the site means that much of data related to animals will likely be more influenced by the surrounding countryside than by the solar farm itself especially as many of the observations are taking place on the periphery of the site. A lack of robust and standardised sampling designs to study the effects of solar farms on the environment are a major issue as is the case with Mr Hare's statement (Gómez-Catasús et al., 2024). Whilst Mr Hare has described the fact that data from Weaveley are being made available for universities he neglects to point out that this is a single sample site. For such studies to be statistically robust they must adopt a Before/After/Control/Impact (BACI) design across multiple solar farms and control sites (Gómez-Catasús et al., 2024). Data from one site are insufficient to understand the impact of solar farms on various aspects of the environment including physical parameters and biodiversity. The exact location of the site could exert a strong influence on the results of observations and be, for example, exceptionally diverse or exceptionally species poor because of biophysical characteristics or through chance. Likely variation across sites where solar panels are installed must be taken into account by survey designs usually through replication and with one site this is not possible. We are provided with no details here of the science objectives of the Weaveley Site, the survey design including the statistical approaches to look for significant effects, what survey methods are aimed to measure and likely survey method biases (Bonar et al., 2011). In conclusion, Mr Hare's statement about not seeing the claimed biodiversity losses is irrelevant as they are based on observations from a single small solar farm without replication across different solar sites and no data are presented demonstrating in a statistically robust manner that such a claim is true. His comment that the hedges are effectively hiding the site may reflect the maturity of the hedges in this location and the fact that the land is quite flat, unlike many other areas of the Botley West Solar Power Station in the Central and Southern sites where panels are on slopes.	The question of the benefit of solar sites for biodiversity in the UK has been addressed by numerous peer-reviewed studies across a diverse range of settings. The large majority of these have shown that, with the correct management, when a site goes from intensive arable to solar, managed for biodiversity, there are statistically significant benefits for ecology. For example, Copping <i>et al.</i> (2025) identified a significantly higher diversity and greater abundance of farmland birds of conservation concern across multiple solar sites in Cambridgeshire compared to arable controls. Jarcuska <i>et al.</i> (2024) found similar results for 32 solar plots in Slovakia compared to adjacent control plots in a grassland setting while a review of solar habitat design within 185 research articles by Blaydes <i>et al.</i> (2024) identified evidence for a range of interventions that benefit pollinators. Although not peer reviewed, work by the University of Lancaster and Solar UK has also highlighted the benefits that well designed solar sites can have for biodiversity by the survey for a range of taxonomic groups across 124 solar sites across the UK. Therefore, although there are some evidence gaps, such as that relating to the impact of solar on bats (from the work by Tinsley <i>et al.</i> 2023 and Szabadi <i>et al.</i> 2023), the Applicant acknowledges such gaps and is working with Natural England to ensure that the Project is designed in such a manner that potential impacts are avoided through the provision of appropriate buffers, for example. Therefore, although the Weaveley example is a single site, the benefits for biodiversity of well-designed solar sites have been observed across multiple locations across the UK.	Local Ecology and Nature
REP1-187	Tom Lewis	Analysis of land designated for solar panels in the Central area of BWSF (Source 5). 80% of the land proposed to contain solar panels west of the Evenlode (Central Site: bounding Lower Road:) is of the highest agricultural land quality, grades 1, 2, and 3a (2%, 19% and 59%, respectively). The remaining 20% of land is grade 3b, which is still of good to moderate quality. These data are accurate quantitative determinations, using the maps and agricultural survey results supplied by PVDP. For the area south of Goose Eye Farm, which was not surveyed, it is assumed the bounding land grades continue through the unsurveyed area. Alternatively, removing that land from the calculation, does not reduce the area of highest quality land.	The areas of the ALC grades within the areas surveyed within the entire Project site are provided in Volume 1, Chapter 17: Agricultural Land Use and Public Rights of Way [APP-054] Table 17.17. The Applicant is currently arranging access to the remaining unsurveyed areas of the cable route option areas (67ha) which would be temporarily affected during the cabling works, but it is considered that, taking into account the soil types within these areas, these would not make a significant difference to the overall distribution of ALC grades across the site.	Agricultural Land Use
REP1-187	Tom Lewis	Evidence from a tenant farmer who farms the land designated for panels would strongly disagree that this land is of poor quality. Under good management, the data presented, shows that the land is capable of producing above National average yields of cereals. (Source 1 and 2 of the document)	The agricultural land classification of the Site has been assessed in accordance with the MAFF 1988 ALC Guidelines which classify land according to the extent to which its physical limitations impose long term limitations on agricultural use. The guidelines state at page 2 that "the grading does not necessarily reflect the current economic value of the land, land use, range of crops, suitability for specific crops or level of yield." Volume1, Chapter 17: Agricultural Land Use and PRow [APP-054] Section 17.6 includes an assessment of the potential	Site Selection and Cable Route Alternatives

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			change in agricultural land use based on the average yields for winter wheat, taken from the Defra publication Agriculture in the UK 2023. The economic effect of the change in agricultural land use is assessed in Volume 1, Chapter 15:Socio Economics [APP-052]	
REP1-188	Vincent Goodstadt	The broad principles involved in the various National Planning Statements on energy infrastructure include a range of guidance will be key tests at this examination. For example, it is understood that 38% of the proposed Botley West Solar Farm is on the Best and Most Versatile (BMV) agricultural land (Grades 1–3a), which is not supportive of the the government's desire for land to develop to solar farms to be mainly on brownfield, industrial and low and medium grade agricultural land (DESNZ Solar Strategy 2023 page 37).	<p>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%).</p> <p>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.</p> <p>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.</p>	Agricultural Land Use
REP1-188	Vincent Goodstadt	<p>The scale of the development to serve about a third of million households clearly serves an area greater than even Oxford City Region (c. 160 K). So any consideration of alternatives needs to be across a much wider area. The technical supporting documents makes assertions generally about the area of search but does not demonstrate this with any detail. For example, it states that the search was in terms of the requirements for a 250 MW farm (para. 5.4.1.10) but no demonstration of the alternative locations that could meet this scale of energy output nor why they could not meet their own criteria, namely:</p> <ul style="list-style-type: none"> • avoiding adverse environmental impacts that arise from the scale proposed; • suitable for constructing a solar farm with available grid connection; • being commercially attractive. <p>On this basis it is difficult to accept that there are no other acceptable alternatives within the broad area of search that the applicants state was undertaken, namely, the south east of England (5.4.1.8), otherwise the government's targets for solar renewable could not be met.</p>	Please see the response to REP1-147 above.	Alternatives and Roofs
REP1-188	Vincent Goodstadt	<p>In addition, ministerial decisions have stated in determining applications that, by definition, solar farms are inappropriate development in the Green Belt requiring to be justified through exceptional over-riding circumstances. It is therefore important to note that the applicant's consideration of planning and environmental constraints of the proposal makes no reference to Green Belt considerations (para 5.4.1.19).</p> <p>National Policy is very clear that Green Belt policy has to be taken into account and applied. Contrary to the assertions of the applicant there is no presumption in favour of large scale solar farm development in the Green Belt. On the contrary, EN1 (overarching Policy Statement) states there is a general presumption against inappropriate development in the Green Belt, and in effect the special case has to be made.</p> <p>Although Green Belt policy has now to be interpreted within the additional consideration of greybelt land in the Greenbelt, the overall principles remain in the context of Botley West.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	Green Belt
REP1-188	Vincent Goodstadt	<p>In this context I consider that there are three areas of national policies that apply to the location of the proposed solar farm and need to be taken into account in reaching its decision. These are:</p> <ul style="list-style-type: none"> • The integrity of the Oxford Greenbelt • The national development goals for the Oxford City region • The relationship to the wider national land use framework - Please refer to document for all details. 	<p>The Applicant has set out its planning balance and its detailed Green Belt case in the Planning Supporting Statement and in particular Appendix 8 [REP1-012].</p> <p>The Applicant is not aware of any conflict with 'national development goals for the Oxford City region, nor with the 'National Land Use Framework'. None of these documents or policies are fully developed and in the Applicants' view should attract little or no weight in the planning balance. The Draft DCO should not be put on hold while these policy documents emerge. The need for CNP infrastructure is urgent and should be judged against prevailing planning policy, and in particular NPS EN-1 and EN-3.</p>	Planning Policy
REP1-189	Ian Leggett	<p>In the ES the applicant states (para 2.1.6) "It is likely that the NGET substation will be located in one of two possible locations;</p> <ol style="list-style-type: none"> 1. On land within the Order Limits, at the Southern Site, at the western most extremity, south of the Farmoor Reservoir; or 2. On land near and to the West of the Applicant's Southern Site, south of the Farmoor Reservoir." <p>I accept that the new substation has to be located in close proximity to the existing high voltage line that crosses Cumnor Parish but I can find no explanation for why the choice of sites for the substation is so limited. Why has</p>	<p>The Applicant has set aside land at Farmoor for the new NGET substation in case NGET does not obtain planning consent on land that it controls. This site was chosen after surveying the entire southern site adjacent to the 400kV overhead line (OHL). Its effects are considered in the Environmental Statement, Chapters 8, 9, 10, 13 and 17 [APP-045,-046,-047, -050, -057].</p> <p>In their written submission at Deadline 1, [REP1-106], NGET state in paragraph 9:</p> <p>The outcome of a robust siting study undertaken by NGET has identified a preferred site for the proposed NGET Farmoor Substation, and NGET will be seeking its own consent through a standalone planning permission pursuant to the Town and Country Planning Act 1990.</p> <p>They add in paragraphs 10 and 11:</p>	Landscape and Visual Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>the applicant assumed that these are the only two locations that should be considered?</p> <p>The building of the substation is a permanent change of use and will have a profound impact on the visual landscape both as a piece of industrial development and because of the likelihood of the construction of additional pylons. In these circumstances, would it not be desirable and appropriate for the advantages and disadvantages of other locations so as to minimise the visual impact?</p>	<p>This planning application for the NGET Farmoor Substation has not yet been made and NGET are targeting submission in 2026. Further, NGET will promote a compulsory purchase order (CPO) to ensure sufficient land rights can be acquired, if voluntary acquisition of the land is not possible.</p> <p>The Project has allowed for a new substation in its proposals within parcel number 13-04, however, this is not the NGET preferred location for this substation. The location proposed by the Project may be reverted to as a potential 'fallback' development site for NGET, if NGET is unable to obtain the necessary consents to develop the NGET Farmoor substation at its preferred site.</p> <p>Details of NGET's site selection and plans for their substation will be made public when they submit their TCPA planning application to Vale of White Horse District Council in 2026.</p> <p>The potential impacts of the Project upon all 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].</p> <p>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. Including from the Oxfordshire Way (Representative Viewpoint 50 [APP-065 and 066]). This viewpoint relates specifically to the NGET and main project substation, within the southern section of the Project.</p>	