



Botley West Solar Farm

Applicant's Response to Rule 17 Letter (17th June 2025)
on ES LVIA Chapter 8

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Approval for issue

Jonathan Alsop

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1 Responses to Rule 17 Letter (17th June 2025)

1.1 Issue 1: Further review of ES Chapter 8

Point 1

- 1.1.1 *“Throughout the ES, the aspect chapter methodologies determine that effects are deemed significant when concluded as moderate and above. However, ES Chapter 8 applies a different approach where only major adverse effects are significant. Can the applicant explain the reason for applying an alternative approach to this Chapter assessment and why it is appropriate?”*

Applicant's Response to Point 1

- 1.1.2 The EIA Regulations do not prescribe or define:
- Methodology
 - Categories of effects
 - Significance thresholds, i.e. when an effect is significant or not
- 1.1.3 The state of environmental impact assessment in the UK (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.
- 1.1.4 IEMA 2011 notes that *“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”* (IEMA 2011, page 60, section 6.3).
- 1.1.5 On determining the significance thresholds of effects IEMA 2011 notes that *“... the EIA regulations do not set out terms for evaluating whether the assessment’s findings are significant or not”* (IEMA 2011, page 61, section 6.3).
- 1.1.6 Note: The IEMA 2011 document above is referred to in GLVIA3, paragraph 3.32 and has not been superseded, and the points made in it remain relevant.
- 1.1.7 The Guidelines for Landscape and Visual Impact Assessment: Third edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3) is the Landscape Institute’s and IEMA’s guidelines for LVIA. This guidance and the subsequent technical guidance notes published by the Landscape Institute for the basis for the methodology used at Botley West Solar Farm.
- 1.1.8 The methodology tailored for the assessment of the Proposed Development is based on the GLVIA3 which recommends that an LVIA *“concentrates on principles and process”* and *“does not provide a detailed or formulaic recipe”* to assess effects, it being the *“responsibility of the professional to ensure that the approach and methodology are appropriate to the task in hand”* (preface to GLVIA3, Roman numeral page x).
- 1.1.9 On determining significance GLVIA3 explains that *“there are no hard and fast rules about what effects should be deemed ‘significant’...”* (GLVIA3, paragraph 3.32). Paragraph 3.33 explains

that “It is not essential to establish a series of thresholds for different levels of significance of landscape and visual effects, provided it is made clear whether they are considered significant.”

- 1.1.10 Landscape Institute Technical Guidance Note-2024-01: Notes and Clarifications of Aspects of Guidelines for Landscape and Visual Impact Assessment: Third Edition (GLVIA3) (Landscape Institute, August 2024) (LITGN-2024-01) provides guidance on ‘Moderate’ significance of effects at 3(5) “...moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not.”
- 1.1.11 The use of matrices is addressed at LITGN-2024-01 3(6) which explains that they “can be useful as a means of illustrating to the reader how judgements are combined and can support and summarise narrative descriptive text (GLVIA3 paragraph 8.10) but they should not dictate judgements. LVIA is a means of documenting professional judgement, rather than a formulaic process.”
- 1.1.12 Project Position: The methodology used to assess the landscape and visual effects of the Botley West Solar Farm follows the standard best practice guidance as set out in the GLVIA3 and subsequent technical guidance notes, published by the Landscape Institute.
- 1.1.13 The Applicant is undertaking a review of moderate effects on the existing scheme to confirm whether the Applicant considers any to be potentially significant. It’s worth noting that as a result of the changes being proposed as part of the change request 2 notification (submitted alongside this Rule 17 response and the other Deadline 2 submissions), it is anticipated that some of the anticipated effects will no longer be experienced by landscape and visual receptors.
- 1.1.14 Following a meeting with the OHAs on the 10th June 2025, the Applicant is consulting with the OHAs to resolve this matter.

Point 2

- 1.1.15 “The Inspectorate notes that construction impacts are termed ‘temporary’ in ES Chapter 8 which, in line with the Chapter methodology in section 8.5, influences the magnitude of impact and subsequently the conclusions of significant effects. As the alteration of the ‘view’ would not be reverted back to baseline conditions at the end of the construction period, it is unclear why these impacts have been termed temporary and how they have reduced the magnitude of impacts in the assessment. Can the applicant either explain this discrepancy or else update the assessment and its conclusions to reflect that construction effects would not be temporary?”

Applicant’s Response to Point 2.

Duration of construction phase impacts

- 1.1.16 Completion marks the end of a construction period and the residual effects arising as a result of the construction of the Proposed Development are therefore of the same magnitude and significance on all visual receptors and viewpoints as those arising during the initial year of operation.
- 1.1.17 The residual effects arising as a result of the construction process itself are assessed as being short-term and temporary, only occurring during the period of the construction phase, and differing in nature from the operational effects mainly due to the influence of the plant used and movement during the construction of the Project, which will not be present during the operational phase.

Duration and reversibility as factors of magnitude of impact

GLVIA3, paragraph 3.24 explains that *“The magnitude of change is stated as combining consideration of the scale or size of effect with the extent of the area affected and duration / reversibility of that effect.”*

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

The LVIA methodology used within ES chapter 8 [PDB-006], considers the different factors of magnitude together. The LVIA methodology applies different weight to these factors. Size and scale having the most influence, but modified by geographical extent, duration and reversibility. This approach is supported by LITGN-2024-01 at 3(3) *“...it is likely that the size/scale of effect will be the most important factor, with geographical extent and duration/reversibility considered as ‘modifiers’.”*

The effects during the construction and decommissioning periods, are both temporary in nature, but short-term in duration. During these phases, the duration has a greater influence in modifying the magnitude of impact; the overall magnitude of impact is less than the size and scale of the impact alone.

The construction works are assessed as being short-term and temporary, only occurring during the period of the construction phase, and differing in nature from the following operational effects, mainly due to the influence of the various construction machinery, earthworks, which will not be present, or result in effects, during the operational phase.

Neither construction nor decommissioning activities would give rise to impact magnitudes over and above those of the operational phase.

During the early part of the operational period, effects are likely to be at their greatest. The effects of the Project during the operational phase are assessed at winter Year 1, with newly planted mitigation and at summer Year 15. The effects over the period from Year 1 to Year 15 are not equal to permanent effects. In the intervening years, the mitigation planting will gradually establish and magnitude of impact attributable to the Project will reduce. Although the period is considered long-term, the effects attributable to the mitigation planting would gradually take effect and balance the effects attributable to the infrastructure elements. This incremental positive change has been factored into the magnitude of impact. The residual/long-term effects are assessed with the proposed mitigation planting at Year 15.

Project position

- 1.1.18 The Botley West Solar Farm is time-limited and temporary due to the Requirement 14 in the draft DCO which imposes a decommissioning obligation on the undertaker after a 37.5 year operational period. This position is supported by NPS EN-3:
- *“Forty years is typical for the project lifetime for a solar farm”* (paragraph 2.10.65).
 - *“Time-limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.”* (paragraph 2.10.66)
- 1.1.19 ES chapter 8 [PDB-006], paragraph 8.5.9 explains that for the purposes of the LVIA, the Project is considered to be fully reversible. This does not mean that baseline views will remain the same, but any physical harm attributable to the solar panels would be addressed during the decommissioning phase. The introduced mitigation planting, apart from providing screening effects and assisting in the integration of the Project into the landscape, follow the landscape character areas’ management guidelines and would provide biodiversity enhancement. These

mitigation effects are, by nature, long-term, beneficial and assist in minimising the adverse effects attributable to the temporary energy infrastructure elements, i.e., the proposed landscape mitigation would be retained after the removal of the infrastructure elements and will continue to provide a positive long-term contribution to and reinforcement of the character of the landscape, in line with the management guidelines for the area. Should the proposed landscape mitigation be considered detrimental to landscape character at decommissioning, then it could be removed. However, as it follows the current management guidelines this is unlikely to be recommended.

Point 3

- 1.1.20 *“Can the applicant explain how potential likely significant effects from planting mitigation has been assessed in ES Chapter 8? E.g. planting altering baseline views.”*

Applicant’s response to Point 3.

- 1.1.21 The Applicant has interpreted this question as referring to two different scenarios
- The built solar farm with the integrated landscape proposals
- 1.1.22 A future baseline without the solar farm, e.g., with the existing (recently planted) Blenheim woodlands and proposed changes landscape.

Impact of the landscape mitigation

- 1.1.23 The impacts of the Project will be minimised by a comprehensive designed-in landscape mitigation scheme. As shown on the Illustrative Masterplan [AS-019], Landscape, Ecology and Amenities Plan [AS-022] and Outline Landscape and Ecology Management Plan [APP-235].
- 1.1.24 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.
- 1.1.25 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.
- 1.1.26 It is intended that the proposed landscape mitigation would be retained, post-decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, at the same time improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW corridors, views of the wider landscape and key features such as church spires, distinctive landforms (including Burleigh Wood) would remain open and available to visual receptors.
- 1.1.27 The retention of proposed designed-in landscape mitigation would enhance the key characteristics of host landscape character areas and be in line with recommended guidelines and enhancements priorities. For example, LCA 4: Estate Parks and Farmlands, which covers much of the northern section of the Project, has the following priorities which the Project and proposed landscape mitigation takes account of and reinforces:
- *retain mature boundary and roadside trees and replant as necessary;*

- *manage and extend existing areas of woodland to maximise their wildlife and landscape value;*
- *plant new blocks and belts of broadleaved woodland within estate farmland to reinforce typically enclosed, well-wooded character. (Page 35, West Oxfordshire Landscape Assessment 1998).*

Future baseline

- 1.1.28 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 **[AS-019]** 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.

Point 4

- 1.1.29 *“Can the applicant explain how they have applied the mitigation hierarchy in their assessment of Landscape and Visual effects in ES Chapter 8 as required by paragraph 3.3.63 of the Overarching National Policy Statement for Energy (EN-1).”*

Applicant’s response to Point 4.

- 1.1.30 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.
- 1.1.31 However, for clarity, the Applicant also reiterates that paragraphs 5.10.5 and 5.10.13 of NPS EN-1 state that:
- 5.10.5 Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.*
- 5.10.13 All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.*
- 1.1.32 This is supported by paragraph 4.2.15 of NPS EN-1 which provides that *“Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts”.*
- 1.1.33 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.
- 1.1.34 In any event, the Project demonstrates the application of the mitigation hierarchy in the following ways:

Avoid

- Early site visits were completed to Blenheim Palace. As part of this process, a field was identified as being visible from the palace grounds. A part of the design process this field was removed from the development in order to avoid the potential visual effects upon the WHS.
- A minimum 25 m buffer zone, from individual properties and settlements, has been incorporated into the Project. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which further limits the effects of the Project. Mitigation, as shown on the Illustrative Masterplan **[AS-019]** and the Landscape, Ecology and Amenities Plan **[AS-022]**, was included to further screen available views from residential properties
- Approximately 35 hectares has been removed from the Project in order to avoid harm to identified archaeological features throughout the Project Site, as shown on the Illustrative Masterplan **[AS-019]** and detailed within ES Chapter 7: Heritage Environment **[CR1-003]**. 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.

Reduce / Mitigate (minimise)

1.1.35 Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan **[AS-019]** and the Landscape, Ecology and Amenities Plan **[AS-022]**. (Refer to response to Point 3 above for further clarification).

- Trees - In general trees are being retained wherever possible
- Hedgerows –The maximum to be removed is approximately 666 m of hedgerows and non-hedgerow linear features at 80 locations.

Compensate

- Trees – The number of trees that are being planted will exceed those removed.
- Hedgerows – At least 26.5 km of new species-rich hedgerow
- Additional habitat creation will include:
 - Approximately 100 ha of new Floodplain mosaic habitats along the River Evenlode Corridor
 - At least 26 km of existing hedgerow to be reinforced through additional planting
 - Approximately 5 ha of new native woodland creation
 - Wildflower grasslands to be managed for wintering and breeding birds
 - Tussocky grasslands alongside hedgerows. Hedgerow buffers will be at least 5 m wide
 - Flood attenuation features to north of Cassington to be managed as wetland habitats
 - Additional mixed scrub habitats alongside hedgerows
 - A range of grasslands within the solar arrays to be managed for conservation value.

Point 5

1.1.36 *“ES Chapter 8, paragraphs 8.9.56 and 8.9.60 and 8.9.66 and 8.9.120 and 8.9.123 state that there would be no appreciation of the construction site as a whole or that depending on the nature of views available and proximity to the solar farm there would be no more than moderate*

adverse. However, it is unclear, in line with the methodology, how these descriptions reduce potential effects. Can the applicant explain why these justifications reduce the impact magnitude and therefore the significance of effect in line with the methodology in section 8.5?"

Applicant's response to Point 5.

- 1.1.37 Paragraphs 8.9.56 and 8.9.60, and 8.9.66 of ES Chapter 8 (LVIA) **[PDB-006]**, referred to in Point 5, are related to construction effects experienced by visual receptors at representative viewpoints and paragraphs 8.9.120 and 8.9.123 are related to operational effects on PRowS; both assessments of the magnitude of impacts in relation to these highly sensitive receptors have been revisited, as set out in Table 1.1 below.
- 1.1.38 The viewpoint assessment deals with static viewpoint locations, for example, taken from a footpath, whereas PRowS assessment examines the potentially affected sections of PRowS represented by Viewpoints.
- 1.1.39 Users of the PRowS, which are visual receptors, are always people. Users of PRowS are considered to have high sensitivity to the type of development proposed. As combining the susceptibility of visual receptors to change and the value attached to the view (LVIA para 8.56) **[PDB-006]** seems in practice to lower the visual sensitivity of receptors where the proposals do not align with the main direction of view. Therefore, there is potential for double-counting this with the assessment of the magnitude of change, which is also affected by the direction of view. Therefore, emphasis is placed on the nature and activity of the visual receptor, such as recreational receptors, e.g., users of PRowS (Chapter 8 Table 8.10) have been cautiously considered to be of high sensitivity.
- 1.1.40 Representative viewpoints were agreed with local planning authorities. The locations for the viewpoints were identified as places where there was the potential for visual receptors to experience significant effects. These were generally where the visual receptor was closest to the Project. The agreed representative viewpoints are single points along a route, the available views will change in character, and overall effects on individual routes, which extend through the wider landscape, are reduced.
- 1.1.41 Table 1.1 below describes effects attributable to the Proposed Development when in operation, as the effects during the construction period are different, mainly due to the visibility of the construction machinery.
- 1.1.42 Table 1.1 describes how the factors of the magnitude of impact (Chapter 8, paragraphs 8.5.10-12), have been taken into account when considering the level of the magnitude of impact.
- 1.1.43 Construction works are temporary in nature, and short-term in duration. The duration and nature of the works have a greater influence on modifying the magnitude of impact, i.e. the impact may be greater, but the duration would be considerably shorter. The type of construction activities proposed is not notably discordant in nature within the agricultural landscape. Based on this, the magnitude of impact during the construction period was considered slightly less than during the operational phase.
- 1.1.44 The proposed mitigation planting is considered by its nature as a positive addition to the landscape character, by reducing the landscape effects attributable to the Proposed Development. However, the proposed landscape mitigation occasionally acts as a partial screen, channelling views and impeding open aspects, these effects would only occur within a short section of routes, with typically wider views. These effects are not constant and views to the wider landscape are still available, e.g. at the location of representative viewpoint 23 (View looking northeast from footpath 238/2/20, near Pinsley Wood). The beneficial effects to landscape character assist in balancing any intermittent adverse effects experienced by visual receptors.

- 1.1.45 Paragraphs 8.9.120 and 8.9.123 assessment statements address operational effects on PRowS, related to the Northern Site. Northern Site is represented in total by fifteen VPs, all of which are taken from PRowS. Some VPs are located on the boundary of the Project Site (for example, VP 4, 10, 9, 11, 13), some VPs are located within the Project Site (VP5a, 5b, 5c) on PRowS, which traverse the Site.
- 1.1.46 The assessment statements in Chapter 8, paragraphs 8.9.120 and 8.9.123, which are based on the Viewpoints assessment provided in relation to the PRowS, which refer to the Site boundary, then the effects would be no greater than moderately adverse, which is not significant. This is a lower level than, for example, Major effects, which have been assessed in relation to the PRowS, traversing the Site (see Chapter 8, paragraph 8.9.121). Both statements are in general terms as the routes are by their nature linear, and as explained, the effects vary along the route, even if it is located within the Site, due to the existing vegetation and topography.
- 1.1.47 Project Position: The linear nature of the PRowS determines that views from the route differ, are transient, the visible scale of the Proposed Development varies, all of which will be experienced within a short period of time, even during the operational phase. We therefore consider these provided assessments stating the maximum level of magnitude of impact of no greater than Medium to be sufficient and adequate.
- 1.1.48 All the findings remain the same as in the assessment. In conclusion, all these viewpoints from PRowS present the following:
- All close-proximity views illustrate a good setback of the low-lying development from the PRowS
 - Solar panels will appear mainly in transient, oblique views along a short section of the routes
 - Solar panels do not form a skyline feature. The existing landscape features take prominence
 - The closest parts of the development would occupy a limited angle of the view
 - Solar panels do not appear as prominent features.

Table 1.1: Applicant's Responses to Point 5 – Magnitude of impact – Visual receptors

Magnitude of impact factor	ES chapter 8 paragraph 8.9.56 Representative Viewpoint 13: View looking northeast from bridleway 342/1/10, near Banbury Road	ES chapter 8 paragraph 8.9.60 Representative Viewpoint 17: View looking west from footpath 265/24/20	ES chapter 8 paragraph 8.9.66 Representative Viewpoint 23: View looking northeast from footpath 238/2/20, near Pinsley Wood	ES chapter 8 paragraph 8.9.120 Public Rights of Way Northern Site PRow 416/22/20 Representative Viewpoint 4	ES chapter 8 paragraph 8.9.123 PRow 43/5 and 379/1/20 Representative Viewpoint 10
Size and scale					
The scale of the change in the view with respect to the loss or addition of features in the view and changes in its composition, including the proportion of the view occupied by the proposed development	Approx 45 degrees of the view occupied by the development	Approx 70 degrees of the view is occupied by the development. The closest panels, however, only occupy 40 degrees of the view.	The existing open view will be lost, and approximately 110 degrees of the view will be occupied by the development.	Limited angle of close proximity view will be occupied by the development.	Due to the distance and intervening terrain and vegetation, the solar panels are not obvious features within the available wide view.
The degree of contrast or integration of any new features or changes in the landscape with the existing or remaining landscape elements and characteristics in terms of form, scale and mass, line, height, colour and texture	Solar panels appear on the backdrop of distant vegetation, not on the skyline. The substation appears on the skyline, but distantly. The foreground vegetation related to the field boundaries and bridleway retains its prominence.	Solar panels appear partially on the backdrop of distant vegetation, partially forming the skyline. The foreground vegetation related to the field boundaries and footpath retains its prominence.	The distant forested landform forms the skyline above the solar panels, across the visible panorama. The electricity poles in the foreground appear to be the most prominent structures.	Due to the low-lying nature of the development, the skyline will not be affected. The existing trees appear as the most prominent features against the skyline. The existing foreground elements, such as fences and hedgerows, intervene in the view of the part of the development to the south east.	The skyline is formed by distant vegetation, above the solar panels, which are well absorbed into the wider landscape.
The nature of the view of the proposed development, in terms of the relative amount of time over which it will be experienced and whether views will be full, partial or glimpses	Within a short section crossing the field	Within a short section crossing the field	Within a short section crossing the field	Within a short section along the field boundary	Within a short section crossing the field

Magnitude of impact factor	ES chapter 8 paragraph 8.9.56 Representative Viewpoint 13: View looking northeast from bridleway 342/1/10, near Banbury Road	ES chapter 8 paragraph 8.9.60 Representative Viewpoint 17: View looking west from footpath 265/24/20	ES chapter 8 paragraph 8.9.66 Representative Viewpoint 23: View looking northeast from footpath 238/2/20, near Pinsley Wood	ES chapter 8 paragraph 8.9.120 Public Rights of Way Northern Site PRow 416/22/20 Representative Viewpoint 4	ES chapter 8 paragraph 8.9.123 PRow 43/5 and 379/1/20 Representative Viewpoint 10
Geographical extent					
the angle of view in relation to the main activity of the receptor	Oblique view for the users of the bridleway	Oblique view for the users of the footpath	Direct views to a small part of the Project.	Oblique view for the users of the footpath	Direct view from the ProW traversing west through field.
the distance of the viewpoint from the proposed development	Next to the site boundary	Next to the site boundary	Next to the site boundary	Next to the site boundary	0.2 km
the extent of the area over which the changes would be visible	One side of the view, as another side is lined by vegetation	One side of the view, as another side is lined by vegetation	Open fields surround the viewpoint	Open fields surround the viewpoint	Open fields surround the viewpoint
Duration and reversibility					
Duration of effects during construction	Short term temporary	Short term temporary	Short term temporary	Short term temporary	Short term temporary
Duration of effects during operation Y1 up to Y15	Long-term temporary	Long-term temporary	Long-term temporary	Long-term temporary	Long-term temporary
Residual effects at Year 15 with established mitigation planting	Long-term	Long-term	Long-term	Long-term	Long-term
Reversibility of effects	Fully reversible	Fully reversible	Fully reversible	Fully reversible	Fully reversible
Magnitude of impact assessed					
Level of effects during construction (temporary short-term adverse effects)	Medium magnitude Moderate adverse not significant effects	Medium magnitude Moderate adverse not significant effects	Medium magnitude Moderate adverse not significant effects	Medium magnitude Moderate adverse significant effects	Medium magnitude Moderate adverse significant effects

Magnitude of impact factor	ES chapter 8 paragraph 8.9.56 Representative Viewpoint 13: View looking northeast from bridleway 342/1/10, near Banbury Road	ES chapter 8 paragraph 8.9.60 Representative Viewpoint 17: View looking west from footpath 265/24/20	ES chapter 8 paragraph 8.9.66 Representative Viewpoint 23: View looking northeast from footpath 238/2/20, near Pinsley Wood	ES chapter 8 paragraph 8.9.120 Public Rights of Way Northern Site PRoW 416/22/20 Representative Viewpoint 4	ES chapter 8 paragraph 8.9.123 PRoWs 43/5 and 379/1/20 Representative Viewpoint 10
Level of effects during operation Y1 up to Y15, (the nature of effects gradually changing from maximum adverse effect to positive or neutral effects)	Medium magnitude Moderate to Major significant effects	Medium magnitude Moderate to Major significant effects	Medium magnitude Moderate , not significant effects	Medium magnitude Moderate , not significant effects	Medium magnitude Moderate , not significant effects
Level of effects at Year 15 with established mitigation planting. It should have been clarified that in order to illustrate the mitigation for bridleways and footpaths, the locations of VPs selected are within an area which can illustrate the effects of the proposed mitigation planting.	Medium magnitude Minor to Moderate not significant effects	Medium magnitude Minor not significant effects	Low magnitude Minor not significant effects	Low magnitude Minor not significant effects	Low magnitude Minor not significant effects

Point 6

- 1.1.49 *"There are a number of uncertainties around how conclusions have been reached in ES Chapter 8, section 8.9 where it is not clear how the methodology has been applied.*
- 1.1.50 *This includes:*
- *not explaining the receptor sensitivity combination with the magnitude of impact (examples include paragraphs 8.9.20, 8.6.47, 8.9.52, 8.9.56 and 8.9.64)*
 - *not clearly explaining the judgement in line with section 8.5 for why a conclusion (e.g. moderate or major effect) has been reached where there is potential for multiple conclusions in line with Table 8.12 (examples include paragraphs 8.9.32, 8.9.45 and 8.9.123)*
 - *where major effects are identified, why they are not considered significant (examples include paragraphs 8.9.121 and 8.9.127)*
 - *Can the applicant either explain these discrepancies or else update the assessment and its conclusions to correct them."*

Applicant's Response to Point 6.

Points 6.1 and 6.2

- 1.1.51 First two points request explanations of the receptor sensitivity combined with the magnitude of impact, or why a conclusion (e.g. moderate or major effect) has been reached in reference to the matrix presented in the LVIA Methodology Table 8.12.
- 1.1.52 As noted in the response to Issue 1, Point 1, above, LVIA is not a scientific discipline, it is not formulaic - it deals with perceptual qualities and relies on professional judgement. The use of the matrices may be useful but should not dictate professional judgement. There are apparent anomalies in the significance of some combinations, this is generally where professional judgement has been used which appear counter to the combination of sensitivity and magnitude of impact in the matrices, but where the reality, using professional judgement, is something different, i.e. there are constraints with simply using the thresholds/definitions in the matrices.
- 1.1.53 Table 1.2, below, provides a breakdown of the magnitude of impact assessment in relation to the Viewpoints, which were referred to under bullet points 1 and 2.
- 1.1.54 With regard to the sensitivity of the receptor and factors of the magnitude of impact, please see the response under Point 5.
- 1.1.55 It is acknowledged that the question has arisen because in relation to high sensitive receptors/ Viewpoints, both Low and Medium magnitude of effects have been considered as resulting in Moderate significance, or Medium magnitude of effects resulting in Minor to Moderate and in relation to some other VPs, resulting in Moderate significance (see Table 1.2 below).
- 1.1.56 As explained above, the matrix is just a guide. The assessment, which deals with perceptual effects, has a limited scale of ratings to represent the relationship of effects to the threshold of significance. In this case, the sensitive visual receptor experiences transient views when moving on a linear route, where views vary along the route and even around the Viewpoint.

Table 1.2: Applicant's response to Point 6 - Receptor sensitivity combined with the magnitude of impact

Magnitude of impact factor	ES chapter 8 paragraph 8.9.47 Representative Viewpoint 5b: View looking east from footpath 416/5/20	ES chapter 8 paragraph 8.9.52 Representative Viewpoint 9: View looking north from footpath 379/1/10 (Oxfordshire Way)	ES chapter 8 paragraph 8.9.56 Representative Viewpoint 13: View looking northeast from bridleway 342/1/10, near Banbury Road	ES chapter 8 paragraph 8.9.64 Viewpoint 21: View looking southeast from footpath 238/1/10, near Pinsley Wood	Representative Viewpoint 4: View east from footpath 416/22/20, near Lower Dornford Farm
Size and scale					
The scale of the change in the view with respect to the loss or addition of features in the view and changes in its composition, including the proportion of the view occupied by the proposed development	Approx 180 degrees of the view occupied by the development	Solar panels are set back approximately 150m from the viewpoint, on a slope.	Approx 45 degrees of the view occupied by the development	Limited visibility of the upper section of solar panels at a distance of 170m. Development on a distant higher ground would be heavily filtered by intervening vegetation.	Limited angle of close proximity view will be occupied by the development.
The degree of contrast or integration of any new features or changes in the landscape with the existing or remaining landscape elements and characteristics in terms of form, scale and mass, line, height, colour and texture	The view is over the site due to the ground falling eastwards, towards the A4260. The distant vegetation forms the skyline, appearing above the Solar panels.	The existing trees appear above the panels on the skyline. The development on the field to the left would be difficult to notice in the context of farm buildings.	Solar panels appear on the backdrop of distant vegetation, not on the skyline. The substation appears on the skyline, but distantly. The foreground vegetation related to the field boundaries and bridleway retains its prominence.	Due to the low-lying nature of the development, the intervening vegetation and the distance, then the development would be absorbed into the wider landscape context and would not be obvious.	Due to the low-lying nature of the development, the skyline will not be affected. The existing trees appear as the most prominent features against the skyline. The existing foreground elements, such as fences and hedgerows, intervene in the view of the part of the development to the south east.
The nature of the view of the proposed development, in terms of the relative amount of time over which it will be experienced and whether views will be full, partial or glimpses	Within a short section crossing the field	Within a short section crossing the field	Within a short section crossing the field	Within a short section along the field boundary	Within a short section along the field boundary
Geographical extent					

Magnitude of impact factor	ES chapter 8 paragraph 8.9.47 Representative Viewpoint 5b: View looking east from footpath 416/5/20	ES chapter 8 paragraph 8.9.52 Representative Viewpoint 9: View looking north from footpath 379/1/10 (Oxfordshire Way)	ES chapter 8 paragraph 8.9.56 Representative Viewpoint 13: View looking northeast from bridleway 342/1/10, near Banbury Road	ES chapter 8 paragraph 8.9.64 Viewpoint 21: View looking southeast from footpath 238/1/10, near Pinsley Wood	Representative Viewpoint 4: View east from footpath 416/22/20, near Lower Dornford Farm
the angle of view in relation to the main activity of the receptor	Both sides of the view for users of the footpath	Oblique view for users of the footpath	Oblique view for users of the bridlway	Glimpsed views for users of the footpath	Oblique view for the users of the footpath
the distance of the viewpoint from the proposed development	Within the site boundary	Next to the site boundary	Next to the site boundary	170m from the site boundary	Next to the site boundary
the extent of the area over which the changes would be visible	Both sides of the view along the footpath.	One side of the view, as the other side has an open view to the fields	One side of the view, as another side is lined by vegetation	Limited portions of the development, which would be difficult to distinguish	One side if view (to the east), views to a very small part of the Project. Other side of view is open field.
Duration and Reversibility					
Duration of effects during construction	Short term temporary	Short term temporary	Short term temporary	Short term temporary	Short term temporary
Duration of effects during operation Y1 up to Y15	Long-term temporary	Long-term temporary	Long-term temporary	Long-term temporary	Long-term temporary
Residual effects at Year 15 with established mitigation planting	Long-term	Long-term	Long-term	Long-term	Long-term
Reversibility of effects	Fully reversible	Fully reversible	Fully reversible	Fully reversible	Fully reversible
Magnitude of impact assessed					

Magnitude of impact factor	ES chapter 8 paragraph 8.9.47 Representative Viewpoint 5b: View looking east from footpath 416/5/20	ES chapter 8 paragraph 8.9.52 Representative Viewpoint 9: View looking north from footpath 379/1/10 (Oxfordshire Way)	ES chapter 8 paragraph 8.9.56 Representative Viewpoint 13: View looking northeast from bridleway 342/1/10, near Banbury Road	ES chapter 8 paragraph 8.9.64 Viewpoint 21: View looking southeast from footpath 238/1/10, near Pinsley Wood	Representative Viewpoint 4: View east from footpath 416/22/20, near Lower Dornford Farm
Level of effects during construction (temporary short-term adverse effects)	Medium magnitude Moderate adverse not significant effects	Medium magnitude Moderate adverse not significant effects	Medium magnitude Moderate adverse not significant effects	Medium magnitude Moderate adverse significant effects	Medium magnitude Moderate adverse significant effects
Level of effects during operation Y1 up to Y15, (the nature of effects gradually changing from maximum adverse effect to positive or neutral effects)	Medium magnitude Moderate to Major significant effects	Low magnitude Moderate not significant effects	Medium magnitude Moderate to Major significant effects	Medium magnitude Moderate , not significant effects	Medium magnitude Moderate , not significant effects
Level of effects at Year 15 with established mitigation planting. It should have been clarified that in order to illustrate the mitigation for bridleways and footpaths, the locations of VPs selected are within an area which can illustrate the effects of the proposed mitigation planting.	Medium magnitude Minor to Moderate not significant effects	Low magnitude Minor not significant effects	Medium magnitude Minor to Moderate not significant effects	Low magnitude Minor not significant effects.	Low magnitude Minor not significant effects

Point 6.1

- 1.1.57 The following sections clarify the findings of Chapter 8, Para 8.9.20 and 8.9.123, as requested under Point 6.

Cable Route Corridor Options (Para 8.9.20)

- 1.1.58 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).
- 1.1.59 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 medium susceptibility to the type of development proposed.
- 1.1.60 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.
- 1.1.61 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 sensitivity to the type of development proposed. As the works are expected to take place simultaneously with the other construction works, and due to the scale of the simultaneous works sensitivity of the landscape is considered Medium to High. This type of construction work would result in a direct overall medium-scale localised temporary change to the existing landscape resource.
- 1.1.62 The temporary nature and reversibility of the effects will minimise any perceived impact, which is considered to be of a Medium magnitude upon the LCAs. The magnitude of impact would decrease to negligible beyond the proximity to the works area. The Medium magnitude of change upon a medium-high sensitive landscape would result in Moderate and not significant effects. The nature of these effects would be direct, short-term, localised (reversible) and adverse.
- 1.1.63 Project Position: Para 8.9.20 states that the cable route option(s) would not give rise to a landscape effect greater than that identified for the main Project Site.
- 1.1.64 The statement should have included the statement that the identified direct magnitude of impact upon the project Site was identified as Medium, resulting in a Moderate and not significant effect for the Project Site.

Point 6.2

- 1.1.65 For reference the Point 5, para 1.1.39-41 of this response also deals with the assessment of PRoWs related to the Northern Site, as provided below.

Operational Phase Visual Effects Public Rights of Way Northern Site (8.9.123)

- 1.1.66 Users of PRoWs 413/5 and 379/1/20, which forms part of the Oxfordshire Way, passing in proximity to or through the northern and central sections of the Site are represented by Viewpoint 9 (see Table x above) and 10 (see Table x above).
- 1.1.67 The LVIA [PDB-006] provides the following assessment:
- 1.1.68 Following the construction phase (on completion), winter Year 1, users of PRoWs 43/5 and 379/1/20 would have varying views of the solar farm. Depending on the direction of travel, intervening topography and existing reinforced vegetation. Although proposed vegetation would have been implemented at this stage it would have limited screening and softening effects. Depending on the nature of views available and proximity to the solar farm, users would experience a magnitude of impact of no greater than Medium. Resulting in a significance of effect no greater than Moderate adverse, which is not significant.
- 1.1.69 At summer Year 15, proposed vegetation would have matured, reaching its desired design function. Where reinforced or new hedgerow planting and trees are adjacent to PRoW which pass through the Project Site, it would largely screen available views. Where views are available from sections of the PRoW at a greater distance from the solar farm (e.g. Representative Viewpoint 10), proposed planting would help to break up the overall scale of the solar farm better integrating it into the landscape. There would be a Low magnitude of impact and Minor adverse residual significance of effect from these PRoW. With impacts reduced from those parts of the PRoW at a greater distance to the Project. These effects would not be significant.
- 1.1.70 Project Position: For clarification, the linear nature of the PRoWs determines that views from the route differ, are transient, and the visible scale of the Proposed Development varies. We therefore consider these provided assessments stating the maximum level of magnitude of impact of no greater than Medium to be sufficient and adequate.

Point 6.3

- 1.1.71 Third bullet point – Paragraph 8.9.121 is referring to footpath users. Specifically in relation to PRoW 342/1/10 (Representative Viewpoint 13). Due to a late design change, removing the secondary substation away from this location and therefore not affecting the view, alterations were required to the assessment of effects. Changes were made to the specific viewpoint assessment(s). However, corresponding revisions were not carried out for paragraph 8.9.121. This is corrected in Table 1.3, below.
- 1.1.72 Paragraph 8.9.127 is referring to the effects of the NGET and main project substation upon PRoW near the southern section of the Project. This has been incorrectly noted as not significant. Elsewhere within the LVIA [PDB-006], a significant effect has been acknowledged from PRoW 184/50/20 (Representative Viewpoint 50), which is the same PRoW referred to in paragraph 8.9.127. This is an inconsistency and has been corrected in Table 1.3, below.

Point 6.4

- 1.1.73 Fourth bullet point – These have been completed/corrected in Tables 1.2 and 1.3, below.

Table 1.3: Applicant’s response to Point 6, third bullet point - Significance of effect corrections – landscape and visual receptors

Landscape or visual receptor	Sensitivity of receptor	Magnitude of impact	Significance of effects	Significance in ES chapter	Corrected significance
PRoW 342/1/10 (Representative Viewpoint 13) (ES chapter 8, paragraph 8.9.121)	High	Medium	Major adverse	Not significant	Significant
PRoW 184/50/20 (ES chapter 8, paragraph 8.9.127)	High	High	Major adverse	Not significant	Significant