



Botley West Solar Farm

Applicant's Responses to other D2 Submissions

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Contents

1	Introduction.....	1
1.1	Purpose of this Document	1
1.2	A total of 139 submissions were submitted to the Examination at Deadline 2. 45 of these were from the Applicant, with 94 being from Interested Parties. Structure of this document.....	1
2	Applicant's Responses to Representations provided at Deadline 2	5
2.1	Local Authorities and Statutory Consultees	5
2.2	Non-Statutory Consultees	6
2.3	Public / Landowner.....	23

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 2 – Local Authorities and Statutory Consultees.....	5
Table 2.2:	Applicant's Responses to Representations provided at Deadline 2 – Non-Statutory Consultees	6
Table 2.3:	Applicant's Responses to Representations provided at Deadline 2 – Public / Landowner	23

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 other submissions received at, and post, Deadline 2 of the Examination.
- 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 and Deadline 2 was on 1 July 2025.
- 1.1.3 The Applicant's responses to the additional documents provided at Deadline 2 **[REP2-025]** are outlined in this document.
- 1.1.4 The Interested Parties' submissions are set out in Table 2-1 below
- 1.1.5 A total of 139 submissions were submitted to the Examination at Deadline 2. 45 of these were from the Applicant, with 94 being from Interested Parties.

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 2 – Local Authorities and Statutory Consultees
 - Table 2.2: Applicant's Responses to Representations submitted at Deadline 2 – Non-Statutory Consultees
 - Table 2.3: Applicant's Responses to Representations submitted at Deadline 2 – 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 **[REP2-002]**.

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

Examination Reference Number	Interested Party
REP2-046	Cassington Parish Council
REP2-047	Cumnor Parish Council
REP2-048	Cumnor Parish Council
REP2-049	Oxfordshire Host Authorities
REP2-050	Oxfordshire Host Authorities
REP2-051	Oxfordshire Host Authorities

Examination Reference Number	Interested Party
REP2-052	Civil Aviation Authority
REP2-053	Environment Agency
REP2-054	Forestry Commission
REP2-055	Historic England
REP2-056	Historic England
REP2-057	Natural England
REP2-058	National Highways
REP2-059	Begbroke and Yarnton Green Belt Campaign (BYG)
REP2-060	Begbroke and Yarnton Green Belt Campaign (BYG)
REP2-061	Begbroke and Yarnton Green Belt Campaign (BYG)
REP2-062	Begbroke and Yarnton Green Belt Campaign (BYG)
REP2-063	Begbroke and Yarnton Green Belt Campaign (BYG)
REP2-064	Begbroke and Yarnton Green Belt Campaign (BYG)
REP2-065	Berks, Bucks & Oxon Wildlife Trust
REP2-066	Bladon Village Hall and Recreation BVHRC
REP2-067	Blenheim Palace
REP2-068	Cotswolds National Landscape Board
REP2-069	ICOMOS-UK
REP2-070	ICOMOS-UK
REP2-071	ICOMOS-UK
REP2-072	ICOMOS-UK
REP2-073	ICOMOS-UK
REP2-074	ICOMOS-UK
REP2-075	Indigo Networks
REP2-076	National Grid Electricity Transmission Plc
REP2-077	Oxford Aviation Services Limited
REP2-078	Southern Gas Networks plc
REP2-079	Stop Botley West
REP2-080	Stop Botley West
REP2-081	Stop Botley West
REP2-082	Stop Botley West
REP2-083	Stop Botley West
REP2-084	Thames Water
REP2-085	The Chancellor Masters and Scholars of the University of Oxford
REP2-086	Antony Scott Houghton
REP2-087	Antony Scott Houghton

Examination Reference Number	Interested Party
REP2-088	Bill McGill
REP2-089	Bojan Ivanovic
REP2-090	Bojan Ivanovic
REP2-091	Bruce Windwood
REP2-092	Bruce Windwood
REP2-093	Calum Miller MP
REP2-094	Calum Miller MP
REP2-095	David Beaumont
REP2-096	David Foster
REP2-097	David Sherratt
REP2-098	Deborah Mackin
REP2-099	Dermot Magee
REP2-100	Domonique and Paul Wightman
REP2-101	Dr Lidia Arciszewska
REP2-102	Dustin Sean Dryden
REP2-103	Dustin Sean Dryden
REP2-104	Dustin Sean Dryden
REP2-105	Dustin Sean Dryden
REP2-106	Frances Sunderland
REP2-107	Harry St John
REP2-108	Harry St John
REP2-109	Jenny Dimmer
REP2-110	Joanna Norton
REP2-111	Jonathan Ford
REP2-112	Julie Hutton
REP2-113	Julie Hutton
REP2-114	Kathryn Thomson
REP2-115	Kathryn Thomson
REP2-116	Kathryn Thomson
REP2-117	Layla Moran MP
REP2-118	Malcolm and Jayne Harding
REP2-119	Martin & Susan Oldfield
REP2-120	Michael Brown
REP2-121	Michael Brown
REP2-122	Michael Field
REP2-123	Miles Clissold Tuely

Examination Reference Number	Interested Party
REP2-124	Ninon Linnell
REP2-125	Patrick Osborne
REP2-126	Pauline Briggs
REP2-127	Robert G F Stokes
REP2-128	Robert G F Stokes
REP2-129	Robert G F Stokes
REP2-130	Robert G F Stokes
REP2-131	Robert G F Stokes
REP2-132	Roger and Dianne Parker
REP2-133	Roger and Dianne Parker
REP2-134	Roger and Dianne Parker
REP2-135	Samuel Pegg
REP2-136	Simon & Dawn Leedham
REP2-137	Terence Kenneth Castle
REP2-138	Tim Sumner

2 Applicant’s Responses to Representations provided at Deadline 2

2.1 Local Authorities and Statutory Consultees

Table 2.1: Applicant’s Responses to Representations provided at Deadline 2 – Local Authorities and Statutory Consultees

Examination Library Ref.	Name	Comment	Applicant’s Response	Issues
REP2-049	Oxfordshire Host Authorities	<p>Rule 17 letter (17/06/25)</p> <p>Local Authorities Issue 2: Assessment of Effects</p> <p>The ExA raised that it is stated in relevant representations, written representations and Local Impact Reports that the applicant’s Landscape and Visual assessment in ES Chapter 8 has ‘downplayed’ the potential effects of the proposed development.</p> <p>The OHAs have provided a joint response [REP2-049].</p>	<p>The Applicant has provided its response to the Rule 17 - Request for further Information [PD-009] in the Applicant’s Response to Rule 17 Letter (17th June 2025) on Environmental Statement Landscape and Visual Impact Assessment Chapter 8 [REP2-029], which was submitted at Deadline 2. At Deadline 3, the Applicant has supplemented that response with a new deliverable containing the Applicant’s Response to the OHAs Response to the Rule 17 Letter.</p>	Landscape_and_Visual_Impacts

2.2 Non-Statutory Consultees

Table 2.2: Applicant's Responses to Representations provided at Deadline 2 – Non-Statutory Consultees

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP2-054	Forestry Commission	<p>Item 1: Explicitly consider all direct and indirect impacts on Ancient Woodland, Ancient Trees and Veteran trees in line with the Standing Advice. We advise that the following measures could help to avoid deterioration of irreplaceable habitat:</p> <ul style="list-style-type: none"> • Larger and more nuanced buffers that protect and enhance ancient woodland, ancient trees and veteran tree condition • Improved ecological connectivity between ancient woodland blocks, ancient trees and veteran trees through habitat enhancement and creation • Design buffering in a way that complements the mitigation required for bat species assemblages which Natural England have categorised as an Amber concern in their 21st of May representation. <p>While in general solar projects can be designed to provide biodiversity benefits, the scale of this project and the cumulative impact of woodland encroachment and habitat fragmentation needs careful consideration to ensure measures will be effective and proportionate for ruling out impacts to Ancient Woodland, Ancient Trees and Veteran Trees (AW/AVTs).</p> <p>There are multiple areas of ancient woodland connected to the application which could result in deterioration or loss without effective mitigation measures due to the scale of the project, the pressures on woodland edges and the effects to ecological connectivity between woodland blocks that would occur. The National Planning Statement for Energy sets out:</p> <p><i>'5.4.32 Applications should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operation phases.'</i></p> <p><i>'5.4.53 The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.'</i></p> <p>As part of meeting these policies, we would like to reiterate that the application should ensure effective design of suitable buffers and other mitigation measures are in place to avoid all direct and indirect impacts during construction and operation. We have not seen evidence that demonstrates that all potential direct or indirect effects have been considered, avoided and ruled out. The Standing Advice lists different impacts under the 'Direct and indirect effects of development' section and provides guidance for how to rule impacts including the Assessment Guide that planning authorities can use to help make planning decisions in line with the NPPF and to keep a record of the assessment.</p> <p>Woodland buffering</p> <p>The Applicant's Environmental Statement suggests that adopting a 15m buffer will avoid impacts to Ancient Woodland. 15m buffers are a minimum starting point designed for tree root impacts. The Standing Advice states:</p> <p><i>'For ancient woodlands, the proposal should have a buffer zone of at least 15</i></p>	<p>The Applicant's approach to Ancient Woodland and Veteran Trees already complies with the Forestry Commission's co-authored guidance with Natural England https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions. Ancient Woodland buffers can be bigger (i.e. more than 15m) where impacts and effects are proven to be greater - for example in regard to direct impacts like noise, air pollution or recreational activity. Solar development is comparatively low impact, at both construction and operational stages.</p> <p>Currently, the woodlands are surrounded by intensive agriculture with little or no buffer, for example farming practices, including ploughing, take place under the canopy of the woodland in some locations. As such, the design of the Project, with appropriate buffers will improve the existing setting of the woodlands. The inclusion of buffers around the woodlands and around bat flightlines will ensure that connectivity between the woodlands is enhanced. It is intended that the buffers will be designed to complement the requirements of the various bat species identified using the woodlands.</p>	Trees_Plants_and_Flora

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p><i>metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.'</i></p> <p>Based on our desk-based assessment and the scale of this project, we advise that a larger and more nuanced buffer zone is likely required to avoid deterioration of AW/AVTs.</p> <p>The Standing Advice sets out:</p> <p>'Where possible, a buffer zone should:</p> <ul style="list-style-type: none"> • contribute to wider ecological networks • be part of the green infrastructure of the area <p>A buffer zone should consist of semi-natural habitats such as:</p> <ul style="list-style-type: none"> • woodland • a mix of scrub, grassland, heathland and wetland <p>The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone'</p> <p>As part of avoiding deterioration of irreplaceable habitat, we advise designing buffers with a distinct and functional woodland edge habitat by following the principles in this Government guidance to avoid AW/AVT impacts, maximise biodiversity value and incorporate woodlands into the local landscape: Edge design for woodland integration, resilience and biodiversity - GOV.UK We can provide more guidance on this and site specific advice where helpful.</p> <p>Habitat fragmentation</p> <p>We welcome the efforts made to retain or improve habitat connectivity but fragmentation between ancient woodland blocks (and potentially Ancient or veteran trees) is likely to occur due to the extent of development proposed between habitats which could contribute to deterioration of irreplaceable habitat. Fragmenting woodlands can reduce or limit species movement between habitat areas which can result in a decline in species quality and diversity or local species extinction. Isolating woodlands also reduces their resilience to future threats including climate change, pests and disease. Projects with limited access to woodland for forestry/management operations may make future management difficult or unviable which could threaten condition or impact safety/property damage (eg trees at risk of failing) so long-term access should also be secured.</p> <p>Incorporating more areas of habitat creation and enhancement, including woodland, scrub, hedgerows and species-rich grassland could help to retain and improve connectivity between AW/AVTs and avoid deterioration. For example, this would be required between ancient woodland sites that could be fragmented by the project, including; Pinsley Wood, Burleigh Wood, Begbroke wood and Bladon Heath.</p> <p>Ancient trees and veteran trees</p> <p>We advise that a thorough assessment of trees within the project boundary is required to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837) to ensure their protection in line with the Standing Advice and in line with the guidance on our representations. They should also be considered a priority for enhancement as part of biodiversity gains and landscape design – for example, this could be achieved through good practice management and maintenance and creation/enhancement of</p>		

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		connected habitat with the wider landscape.		
		<p>Protected species and irreplaceable habitat</p> <p>The presence of assemblages of bat species and Natural England's concerns regarding impacts on these add to the need for more effective buffering, improved connectivity and landscape design that avoid impacts on AW/AVTs and the bat species that are likely to form an integral part of these irreplaceable habitats.</p> <p>European Protected Species often form an important part of an ancient woodland's ecosystem. AW/AVTs are often uniquely placed to support an array of species that can be very difficult to replicate. Woodland specialists, such as bats, using the woodland are likely to rely on woodland edges and the connected landscape including open areas and hedgerows for foraging and movement between other habitats in the local area. Development between woodland blocks or close to woodland edges can remove suitable foraging habitat and commuting routes.</p> <p>Bigger and more site-specific buffers can support biodiversity which are designed for the needs of the species present on site. For example, bechstein's bats are known to use open areas, woodland edges and hedgerows/tree lines that can go well beyond a 15m buffer. Mitigation measures for avoiding impacts on AW/AVTs, including buffering, can be designed to complement the measures required to avoid other impacts including to bats.</p> <p>We recommend incorporating buffering and landscape design that supports roosting, commuting and foraging opportunities throughout the site, with suitable long-term management in line with good practice and according to site surveys and advice from a suitably qualified ecologist and in agreement with Natural England.</p> <p>Horizontal Direct Drilling</p> <p>We accept the principle of Horizontal Direct Drilling underneath ancient woodland compared to more harmful methods where suitable evidence demonstrates that this is feasible and will not result in loss or deterioration of ancient woodland, and where all viable alternatives have been exhausted including moving the route away from ancient woodland. This may require ground surveys / geomorphological surveys and groundtruthing to ensure the chosen method will be viable and effective for ruling out impacts.</p> <p>We advise that this be robustly demonstrated before loss or deterioration is considered avoided.</p>		
REP2-054	Forestry Commission	<p>Item 2: We would expect the amount of woodland creation being proposed for a project of this scale to be larger considering Government targets and policy regarding tree canopy cover. This could also help to integrate the development into the landscape and avoid impacts referred to in Item 1.</p> <p>We believe there are other improvements to optimise the biodiversity and landscape design which should be explored for a project of national significance like this.</p> <p>EN-1 Overarching National Policy Statement for Energy Section 4.3.20 states:</p> <p>"The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavor that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act."</p>	<p>The principles of landscape design for the Project are set out in the oLEMP [REP2-019] and include woodland in appropriate locations. The Illustrative Masterplan shows indicative locations where such woodland may be planted. There are opportunities for additional woodland planting during detailed design in the landscape zones where such features are proposed (Landscape Zone 4, for example, section 4.5 of the oLEMP).</p>	Trees_Plants_and_Flora

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>We welcome the project's premise to provide woodland creation and an overall gain in hedgerow creation/enhancement as part of delivering biodiversity net gain. However, the proposed woodland created for this project (less than 5 Ha) represents a small proportion of the whole site (approximately 0.35%). The areas of woodland creation proposed also appear to be very small and limited to narrow strips spread across the site. To put this in context, for other NSIPs we have advised creating individual woodlands of at least 5 Ha on their own. Marginal and narrow areas of tree planting and woodland creation are welcome and can provide significant benefits (including screening and habitat connectivity). However, they do not provide the same extent of benefits that significant areas of woodland creation can and it is not clear how the woodland proposed meets Government's definition of woodland set out here: Definition of trees and woodland - GOV.UK which states</p> <p>'We will typically apply the following interpretation. To be considered "woodland", the site must meet all the following:</p> <ul style="list-style-type: none"> • a minimum area of 0.5ha • a minimum width of 20m • a potential tree canopy cover of at least 20% • a canopy consisting of specimens that meet the definition of trees (see Section 3)' <p>We advise that higher amounts of woodland creation that meet the above definition, and overall canopy cover gain (including from trees outside woodland) would be more proportionate to the scale of the project considering Government targets mentioned above. This could also contribute to avoiding impacts referred to in Item 1 where woodland/tree planting also supports improved buffering and improved ecological connectivity.</p> <p>Existing woodland improvement</p> <p>We encourage the improvement of existing woodland condition as an effective way to achieve biodiversity gains using habitats that are already well established, especially where this can support ancient woodland condition given its high ecological value potential as an irreplaceable habitat.</p>		
REP2-054	Forestry Commission	<p>3. Follow good practice regarding tree and woodland design, establishment and management, including for ways to ensure this is landscape-led, delivered effectively so that trees survive and thrive in the face of future threats from climate change and pests and diseases.</p> <p>As the Government's forestry experts, we can provide more advice to help the applicant ensure that the right trees are planted in the right places and for the right reasons. Important guidance regarding good design and establishment of trees and woodland as part of development is outlined below:</p> <ul style="list-style-type: none"> • Land-use and project design in keeping with local strategies and priorities including the emerging Oxfordshire Local Nature Recovery Strategy and the Curlew Recovery project. • Follow UK Forestry Standard. Eg UKFS Landscape & Woodland Design section. The Landscape Character Appraisal Advice Note woodland design process. Landscape Context Analysis can help to create woodland/landscape design that enhances spirit of place, local distinctiveness, creates unity and landscape fit alongside other woodland design principles in UKFS. • Ensure species are well-suited to local soil and climate <ul style="list-style-type: none"> o Check that species are all well-suited to future climate for the site location (using Ecological Site Classification) o Plant in well-matched mixtures (use Forest Development Types to guide) rather than 'cookie-cutter' schemes o While native species are likely to be the most appropriate the use of a small percentage of naturalised, near native species can also be acceptable where they will increase habitat heterogeneity • Trees should be healthy and good practice biosecurity should be followed to prevent the risk of spreading pests and disease, in line with Government advice: https://www.gov.uk/government/collections/tree-pests-and-diseases with suspected pests or diseases reported TreeAlert - Forest Research. Eg Plant Healthy Stock Welcome to Plant Healthy - Plant Healthy / Plant Health Management Standard (planthealthy.org.uk) • Good deer and squirrel management: Woodland creation and mitigating the impacts of deer - GOV.UK • Long term management and maintenance of planted trees and woodland creation to give them every chance to becoming established and where trees do fail, they are replaced • Retain deadwood on site <p>Comprehensive guidance is available here: Tree planting and woodland creation resources - GOV.UK</p>	<p>The proposed management principles and maintenance activities for woodland is set out in sections 11.2 and 16.2 of the oLEMP [REP2-019]. Final details will be provided in the relevant LEMP that is required to be substantially in accordance with the principles set out in the oLEMP.</p>	Trees_Plants_and_Flora

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP2-059	Begbroke and Yarnton Green Belt Campaign (BYG)	<p>2. The Written Summary of these comments provided by Blenheim (RP1-098) qualified these statements by referring to unencumbered freehold land owned by either the Blenheim Palace 1984 Maintenance Fund or the Vanbrugh Unit Trust. The following comments, also not included in the transcript, were also added by [REDACTED]. <i>"The land required for the solar project is held on trust. Income generated by the land must be applied to the World Heritage Site. This is a binding obligation on trustees, who provide account to HMRC on an annual basis. These are existing financial mechanisms in place today, passing funds to the Blenheim Palace Heritage Foundation. Depending on the final design of the scheme and the exact land drawn down, that flow of funds will increase from around £80k pa today to in the region of £500k pa once developed out. All of this income will be committed to the maintenance and restoration of the World Heritage Site. Accordingly, there is significant public benefit to be derived from the development of the solar project in the form of derived income supporting this important heritage asset"</i>.</p> <p>3. However, the Blenheim Palace 1984 Maintenance Fund, which does have a legal obligation to pass its funds to the Blenheim Palace Heritage Foundation (via The Blenheim Foundation) does not appear to own any of the land listed in the Book of Reference (APP-023). Furthermore, there is no reference to any funds from the 1984 Fund being received by the Blenheim Palace Heritage Foundation in its financial accounts, other than the transfer of the ownership of a farm in 2013. The 1984 Fund would, therefore, appear to be an inactive entity which does not function as claimed.</p> <p>4. The wider estate, owned by the Vanbrugh Unit Trust, does have an obligation to provide funds to the WHS. It has traditionally done so from developments undertaken by the Blenheim Estate in this part of Oxfordshire and possibly elsewhere. At the time of writing this submission, Blenheim currently has permission for over 400 houses which remain to be built in Woodstock on three sites, and many others remaining to be built elsewhere in WODC.</p> <p>5. Blenheim regularly uses the argument that its proposed developments outside the WHS are necessary to fund the maintenance of the WHS. However, as far as we are aware this argument has never been accepted by WODC, PINS or the SoS by requiring conditions or legal agreements to be imposed on this basis. At the WODC Development Control Committee on 2 June, which discussed and approved the Council's WR to this Examination, the Woodstock Councillor, [REDACTED], made a critical reference to this tactic being used frequently by Blenheim. A webcast of that meeting is available on the Council's website which confirms Cllr [REDACTED] comment, and which also evidences the strength of feeling about this scheme. The truth of Cllr [REDACTED] observation is vividly illustrated by a further planning application for houses in Woodstock that has just been lodged by Blenheim Estate. Consultants acting on behalf of Blenheim Estate have made a Planning Application to Cherwell District Council for the construction of up to 500 houses on the field to the NE of the Bladon Roundabout (25/01510/OUT). This field is part of the BWSF draft DCO for the routing of cables.</p> <p>6. On page 27 of this Application's Planning Statement, the following claim is made by Blenheim Estate:</p> <p>It is further highlighted that proceeds from the development will go towards the conservation of the Blenheim Palace WHS via the Blenheim Heritage Foundation, whose sole purpose is to repair and maintain the WHS. This is considered a significant heritage benefit resulting from the proposal. It is therefore demonstrated that the low level of "less than substantial harm" as a result of the proposals is outweighed by the heritage and other public benefits. This is another illustration of the way Blenheim endeavours to justify its development programme. It claims benefit for the WHS without ever committing to allocating monies, or to providing any detailed financial explanation of the value of the development, or declaring how much of that value will be used for the maintenance of the WHS. The Estate seems to expect all its developments to be able to offset the harm they cause by a vague intention (never obviously fulfilled) to invest the proceeds into the WHS. The same can, of course, be said of its approach to BWSF.</p> <p>7. The site field for this latest application has a complex planning history, which could be documented if helpful. In summary, Blenheim had an application for 1200 houses including this field rejected by CDC in 2015 (14/0004/OUT). The Estate made, and withdrew, an application for 500 houses in 2022/23 (22/01715/OUT). In both cases the proximity of the site to the WHS was an issue. CDC included this field (PR10) in the draft 2011-31 Review of its Local Plan. It was criticised and rejected by the LP Inspector in his report (para 54), partly on the grounds of its proximity to the WHS, and removed from the Review which was subsequently adopted. The latest iteration of Blenheim's application is in CDC's new draft Regulation 19 Local Plan as KID H1, an allocation for 450 houses. WODC has objected to its inclusion, partly on the grounds of its proximity to the WHS. CDC is due to send that draft by the end of July this year to PINS for Examination.</p> <p>8. It is not, of course, the role of this Examination to form any view on the merits of this new housing application. However, we believe its submission and its history clearly indicates Blenheim's uncaring approach towards the setting of the WHS and its cynical approach to the planning system. The 2024 ICOMOS Technical Review, which describes the adverse effect on the WHS of specific housing developments at the edges of Woodstock, is available to all those involved in this Examination,</p>	<p>The Applicant notes that many of the points raised relate to Blenheim's land ownership and are not therefore appropriate for the Applicant to respond to directly. However, Blenheim has provided the Applicant with a report prepared by Withers LLP following the Open Floor Hearing in May 2025, titled 'Botley West Solar Farm Blenheim Estate Ownership Commentary'. This report includes details of Blenheim's ownership and has been submitted by the Applicant alongside this Deadline 3 submission [reference EN010147/APP/13.6].</p> <p>3. The Blenheim Palace 1984 Maintenance Fund and the 1981 Settlement Trust are two separate entities. In the book of references, The Sunderland Foundation, as Trustee of the Duke of Marlborough's 1981 Settlement is identified. Although trustees of the 1981 Settlement have passed profits through to the Heritage Property in the past – most recently from the Park View development with the decision approved by court order – it does not have a legal obligation to pass its funds to the Heritage Property. 1981 Settlement land only contains cable routes for the Botley West proposal and so income arising is nominal. Using the same convention, the book of references identifies Blenheim Trustee Company No.1 and Blenheim Trustee Company No.2 as Trustees of the Blenheim Palace 1984 Maintenance Fund.</p> <p>The 1984 Maintenance Funds obligation to pass its profits through to the Heritage Property in the report prepared from Withers [reference EN010147/APP/13.6]. Page 39, section three of the Blenheim Palace Heritage Foundation, Charity Accounts to March 2024 provides a schedule of funds received from the Maintenance Funds.</p> <p>4. The Vanbrugh Unit Trust does not have an obligation to provide funds to the World Heritage Site. Outside of the 1984 Maintenance Fund obligations, any contributions to the Heritage Property are made on a discretionary basis to meet the demands of the World Heritage Site as outlined in the World Heritage Site Management Plan and Blenheim ten-year goals. Where discretionary contributions are proposed they are included in the relevant applications</p> <p>5. The report from Withers LLP clarifying the flow of funds from the 1984 Maintenance Fund to the Heritage Property. There are no other discretionary contributions proposed as part of the Botley West project. The applicant is aware of the application and cable routes are designed to work in conjunction with the proposal.</p> <p>6. The Project is an example of where trustees may make a discretionary contribution to the Heritage Property, as they have done on a number of prior occasions. There is no practical limit on the responsibilities of the trustees to the World Heritage Site, and they have been diligent in applying funds where possible to that cause.</p> <p>7. The site sits within Cherwell District Council and at the time of writing remains within the CDC draft local plan having been successfully passed through the Reg19 process, retaining CDC's support</p> <p>9. Please refer to the Statement of Common Ground with Historic England. HE is the conduit between ICOMOS and the consenting process for the development.</p> <p>11. The needs of the World Heritage Site are well documented through the World Heritage Site Management Plan and Blenheim ten-goals. 1984 Maintenance Funds obligation to pass it's profits through to the Heritage Property in the report prepared from Withers [reference EN010147/APP/13.6].</p> <p>12. The 1984 Maintenance Funds obligation to pass it's profits through to the Heritage Property in the report prepared from Withers [reference EN010147/APP/13.6].</p> <p>13. The existing plans for Botley West have taken into account the proposed application and allocation in the local area.</p>	Funding_and_PPA

Examination Name Library Ref.	Comment	Applicant's Response	Issues
	<p>including Blenheim. It was attached to the RR of both WODC and HE. This Review was requested by, and made to, the UK Government. The site of the new application by Blenheim was one of the four sites analysed by ICOMOS (all of them owned by Blenheim). The new application is on the same land as that described by ICOMOS as "Land South of Perdiswell Farm". The development proposal is very similar.</p> <p>9. This Technical Review is critically important; great weight should be given to its analysis and conclusions. As they are available to the ExA we do not summarise them here, except to say a) that ICOMOS was clearly concerned about the adverse effect of the housing schemes proposed; and b) that it wanted to see a thorough evaluation undertaken before development was allowed to happen.</p> <p>10. Within the current planning system the obvious and, perhaps only, place such a nationally significant issue should be judged and properly balanced is through the LP process. Yet despite the Review, Blenheim Estate, the self declared guardian and carer of the WHS, has chosen to try to pre-empt the LP process just before the start of a Local Plan examination with an opportunistic application. Despite [REDACTED] comment in the hearing that "We are proud to care for the World Heritage Site" their submission of this application confirms that Blenheim Estate is more concerned with developing and monetising its land around the WHS than ensuring the protection of its setting. It indicates a disregard for the planning process, the two local District Councils, their officers and the people they represent.</p> <p>11. Clearly, Blenheim does have funds from other developments, as well as extensive commercial activities on the WHS, available for the support of the WHS without BWSF. Significant financial resources also belonging to the Blenheim Estate are held offshore and are therefore opaque. There is no evidence that money from BWSF is needed to maintain the WHS. In any event, there is no undertaking or guarantee from any Blenheim entity that any funds deriving from BWSF will be used to support it. Nor is Blenheim providing the detail of any such commitment to enable the SoS to understand what benefit the WHS might actually derive.</p> <p>12. Any references to the WHS benefitting financially from BWSF are therefore unproven or entirely speculative. We suggest they should be ignored by the ExA in the absence of appropriate disclosure of the finances of the Estate in respect of BWSF; and in the absence of legally binding undertakings to allocate proceeds from BWSF to support specific projects on the WHS.</p> <p>13. Finally, we would draw the ExA's attention to CDC's intention to decide on 25/01510/OUT by 8 September 2025. If this Application were to be approved, it would materially change the land use pattern around the central section of BWSF. We believe this should be reflected in the assessment of BWSF which would consequently need to be reworked. Our view is that the change in assessment would be significantly negative, as this development would add to the already substantial development planned for along the A44 corridor, further reducing the predominantly Green Belt gap between Oxford and Woodstock. This issue was described in BYG's RR-0092 (section 5, pp 21-25). When appropriate, we would wish to make further representations on this matter.</p>		
REP2-060	<p>Begbroke and Yarnton Green Belt Campaign (BYG)</p> <p>1. Financial Transparency, Ownership and Disclosure</p> <p>1.1 [REDACTED] is described as a "Cyprus resident and citizen" (APP 11.4, p.259). In fact, she would be more accurately described as a Russian national with a Cypriot passport. Her Cypriot passport was most likely granted under the "Golden Passport" scheme. This scheme was abandoned by Cyprus in 2020 following infringement procedures being started by the European Commission. Procedures undertaken by the Commission against a similar scheme in Malta resulted in a 29 April 2025 ruling by the European Court of Justice that "A Member State cannot grant its nationality – and indeed European citizenship – in exchange for predetermined payments or investments, as this essentially amounts to rendering the acquisition of nationality a mere commercial transaction." It must therefore be uncertain whether [REDACTED] has, or will retain, Cypriot nationality since under the April 2025 ruling it might be in breach of EU law.</p> <p>1.2 The following statement is made in respect of [REDACTED] name (APP 11.4, p.259): "The spelling of the name follows the transcription from Republic of Cyprus records which are maintained in Greek characters." When the Applicant, SolarFive Limited, was set up at Companies House, the records show that [REDACTED] used the name [REDACTED]. This was also the name used when SolarFive Limited made the application to Ofgem for the Electricity Generation Licence. The use of this name was identified by Private Eye magazine and described as a "false name" (Issue 1601, 30 June 2023, copy submitted with BYG's WR filed at REP1-095). After this, the records at Companies House were amended and the name changed to [REDACTED].</p> <p>1.3 The statement made by the Applicant in this section in respect of the spelling of the name indicates that there was no precedent or lawful basis for using the Europeanised name [REDACTED] for the purpose of company registration. Our research indicates that the name [REDACTED] has not been used in any other company in Europe by [REDACTED]; it has always been [REDACTED]. Using a false name at Companies House is a potentially criminal matter.</p> <p>1.4 References are made to the Funding Statement (APP-022) but no further financial information has been provided. In our RR (RR-0092) we concluded that the Funding Statement was inadequate.</p>	<p>[REDACTED] is a permanent resident of Cyprus and carries a Cypriot passport. The statement in APP 11.4 regarding the spelling of her name is accurate. [REDACTED] has lived permanently in Cyprus since 2012; prior to that she was a permanent resident of Germany. She owns residential property on the island and pays taxes in Cyprus.</p> <p>The Funding Statement contains the latest accounts filed at Companies House for SolarFive Ltd. The filing on 28th February 2025 states "the directors consider that the company is entitled to exemption from audit under section 477 of the Companies Act 2006". Further "the financial statements have been prepared in accordance with the provisions applicable to companies subject to the small companies' regime and in accordance with the provisions of FRS 102 Section 1A – small entities". The accounts were prepared by Blick Rothenberg Limited, Chartered Accountants.</p>	Funding_and_PPA

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		The financial information provided is unaudited and out of date. More importantly, no financial information has been provided for the source of funding, the Cypriot-registered Cransseta Investments, owned by [REDACTED]. The Applicant has therefore not provided any further information that proves there are the available funds required. The funding statement remains lacking in any credibility.		
REP2-060	Begbroke and Yarnton Green Belt Campaign (BYG)	<p>2.Developer capability and past performance</p> <p>2.1 In BYG's RR-0092 we provided a detailed analysis of the Applicant's track record and demonstrated that there is no evidence that PVDP has taken any solar project through to construction. The Applicant has not responded to that analysis. APP 11.4 refers to three projects the Applicant claim demonstrates its track record: Ukijima, Onikobe and Kawasaki, all of which were covered in great detail in our RR.</p> <p>2.2 No mention is made of [REDACTED] late husband [REDACTED] despite the significant evidence provided in our RR (RR-0092) that it was [REDACTED] and [REDACTED] who worked on the Japanese projects. There is no evidence that [REDACTED] herself has been involved directly in solar projects, other than possibly providing funding through Cransseta Investments.</p> <p>2.3 Ukijima is the largest project that PVDP has been involved with. It was not constructed by PVDP and was sold on with significant inherent problems. These were outlined in the Japanese press article we included in our RR. Given the significance this has in respect of PVDP's credibility it is worth repeating in this submission. There have been major difficulties with the project, which we highlight in the text of the article set out below. As of today, it is still under construction. If this is the best project that PVDP can put forward to make its case, it can reasonably be concluded that PVDP's track record is wholly inadequate to support their taking responsibility for any significant project, let alone one the size and sensitivity of Botley West.</p> <p>2.4 Following is an extract from an article on Ukijima Solar Farm that appeared in English in The Mainichi, a Japanese national daily newspaper, on 14 May 2023. [https://mainichi.jp/english/articles/20230511/p2a/00m/0na/012000c]]</p>	The Applicant successfully developed over 1GW solar generation in Japan. As is common with developers, some projects were consented and built, others were sold in order to recycle capital into other projects. Planning consent for Ukujima Mega Solar Project was obtained then the project was sold to a consortium of Japanese companies to build. Construction was challenging, not least because it involved a long subsea cable. It is worth noting that a number of solar projects that have obtained DCO consent since 2020 have been sold by the original developer before construction began – including the first, Cleve Hill in Kent, as well as West Burton and Mallard Pass in Lincolnshire.	Funding_and_PPA
REP2-061	Begbroke and Yarnton Green Belt Campaign (BYG)	<p>Deadline 2: BYG WRITTEN REPRESENTATION 3Comments on the Responses to RRs relating to Decommissioning Obligations and Guarantees (APP-11.4 p. 260)BYG addressed this matter in their RR-0092, Section 4, pp19-21. It was also discussed in ISH1 under item 3f, which dealt with the draft DCO. BYG set out its position on this matter in advance of ISH1 in their WR PDA-001. The evidence that [REDACTED] then gave in an oral submission for BYG at ISH1 was confirmed in a written summary. Following these representations, BYG in this WR comments further on APP-11.4 (p. 260) as it relates to Decommissioning, etc. dealing with the issues in the order in which they arise.</p> <p>1. The outline Decommissioning Plan (APP 236) does not provide sufficient detail to understand:- how the decommissioning will be carried out;- how long it will take (other than a vague assertion of 2 years);- what impacts it would have. For example, there is no detail about how the restoration of agricultural land back to BMV would be achieved. The implication in APP-236 is that no attempt is going to be made, presumably because the ground will have been so badly damaged by the piles supporting the panels. We suggest that reliance on a decommissioning plan which will not be acted on for 40 years requires an assessment now of worse case impacts and harm in all aspects of the decommissioning.</p> <p>2. The Applicant's Funding Statement (APP 4.2) is full of assertions but provides no evidence to suggest that the financial means to decommission will be available and used for that purpose. No evidence has subsequently been provided, including in APP-11.4, to support the assertions made in the Funding Statement.</p> <p>3. Although the decommissioning requirement may be legally enforceable under the terms of the draft DCO, there are cogent, practical considerations that could override this.- Neither PVDP nor SolarFive may be trading in 40 years' time.- They may not have the funds necessary to use for that purpose.- They may not be willing to use these funds for decommissioning.- They may be outside the jurisdiction of UK authorities. The same would equally apply to any successor organisation if PVDP were to sell the project. Failure to decommission may be a criminal offence, but there are simple means by which corporate assets can be shielded to avoid payment and prosecution. In this case the site would remain derelict, or the taxpayer would be required to pay for the clean up.</p> <p>4. There is no way of knowing what asset value the BWSF installations may have at the end of their life, or whether that value would be sufficient to fully fund the decommissioning. It is likely, rather, that the asset value would be low, possibly scrap, because no careful, commercial owner would be replacing panels or other components of the scheme in the last years of its life. The panels would be old, probably compromised, and have suffered significant obsolescence and depreciation. Given the information available, the only reasonable assumption that can be made is that residual asset value would not cover the full decommissioning costs. It is unrealistic and irrational of the Applicant to suggest this is a reasonable safeguard for decommission funding.</p>	The Applicant provided a detailed response to questions and concerns raised about decommissioning in Section 11 of the Applicant's Responses to Relevant Representations [REP1-020] This included comments in relation to the decommissioning phase of the work, the decommissioning plan, its funding, guarantee and the overall intentions for reinstatement of the site.	Decommissioning

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>5. The representations made by the Applicant in respect of this matter raised at ISH1 were no more detailed than are already contained in the Funding Statement. No author of the Funding Statement has yet been identified. There is no PVDP representative involved in the examination who can speak with authority about the financial situation of the Applicant or of any associated companies. During ISH1, the Solicitor acting for the Applicant specifically told the ExA when questioned that he could not vouch for it and, tellingly, did not suggest anyone who could (REP1-095). If their representatives cannot vouch now for the Applicant's financial capability to resource the building of its solar farm, then how much less confidence can be had in its capability to un-build it in 40 years' time? 6. The responses by the Applicant in APP11.4 on decommissioning do not add materially to the insubstantial and unconvincing case set out in the Financial Statement. BYG's view remains, therefore, that without some form of independently verified financial guarantee, such as a bond, between PVDP and the SoS covering the full cost of decommissioning, BWSF cannot rationally be considered a temporary scheme. We query whether in such circumstances the DCO could be made. The analysis of the scheme will, of course, be undertaken and reported to the SoS. We believe that the harm it would cause to the Green Belt, to the setting of the WHS, to BMV agricultural land, and to local communities would be permanent.</p>		
REP2-062	Begbroke and Yarnton Green Belt Campaign (BYG)	<p>Comments on Deadline 1 WR from Historic England (HE)</p> <p>1. In the conclusions to its WR (para 8.1), and the summary to that document (para 1.20), Historic England asserts that BWSF "would contribute to the sustainability of the WHS". That conclusion does not appear to be drawn from either the text of their WR or any other documents produced by HE for this Examination.</p> <p>2. As far as we are aware the only evidence presented which makes such an argument is by the CEO of Blenheim Estate, [REDACTED]. The assumption must therefore be that HE has accepted [REDACTED] argument. We propose that it would be wrong in principle for the Government's independent advisor simply to adopt the argument of a party closely affiliated to the Applicant. In addition, and as demonstrated in our separate Deadline 2 WR submission on the comments made by [REDACTED], the evidence he presented in respect of any benefit to the WHS deriving from the development of BWSF is neither conclusive nor robust.</p> <p>3. There is a disparity between HE's overall conclusion and the detailed comments made in their WR about the ICOMOS Technical Review, which was attached to their RR (RR-0398-Appendix 1). It is suggested by HE (1.16a) that there are gaps in the Applicant's Heritage Impact Assessment because there is no reference to the Technical Review. As HE points out (3.8), this expressed concern about the BWSF proposal's potential impact on the WHS's OUV due to the consequent change it expected in the character of the surrounding landscape. However, HE has chosen to ignore this aspect of the Technical Review altogether. In 3.5 it is suggested that certain land parcels should be removed "as these fields are locations in which the Blenheim ensemble can be appreciated from open countryside". This is very different from ICOMOS's principal concern that "the proposal would lead to a large change in the landscape character of the setting of the property (from rural to semi-industrial) if implemented which may have an impact on the maintenance of its OUV" (3.8).</p> <p>4. HE has chosen not to address this aspect even though it is "the government's statutory adviser on all matters relating to historic environment, including world heritage". Surely the concerns expressed by ICOMOS in respect of the impact on the OUV of the WHS resulting from "large change in the landscape character of the setting" should also have been addressed by HE as a matter of importance in its conclusion?</p> <p>5. On the contrary, HE simply concludes (8.2) that any harm to the OUV will be avoided by "removing the solar panels from the fields immediately to the south of Bladon". There is no caveat offered regarding the views expressed by ICOMOS.</p> <p>6. ICOMOS International has been requested to update their Technical Review(3.10). In the absence of HE's consideration of the wider setting as outlined above, this updated review will clearly be very important. No indication has yet been given as to when it might be available.</p>	<p>The Applicant has provided some information regarding the flow of funds from the leasing of the Blenheim Estate land towards the Maintenance Fund for the upkeep of the World Heritage Site; this is set out in paragraphs 1.5.17 - 1.5.18 of ES Appendix 7.4: Heritage Impact Assessment [APP- 141].</p> <p>Further information has subsequently been provided by Blenheim Palace in their written summary of oral submissions given at the Hearings commencing 12 May 2025 [REP1-098]. The Applicant considers that the identified sum of approximately £500,000 per annum of revenue to the Maintenance Fund represents a significant public benefit.</p>	Historic_Environment
REP2-070	ICOMOS-UK	<p>Should the Secretary of State be minded to grant planning consent to Botley West Solar Farm, ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee recommends omission of those areas which would be especially oppressive to local villages or particularly harmful to this attractive landscape. Solar arrays should be kept apart from all villages by a significant landscape breathing space and never be closer than a 3 minute leisurely walk (200m) from houses on the edges of villages - Shipton Slade, Bladon, Begbroke, Cassington, Church Hanborough. A planning condition is needed to enforce a desirable landscape treatment and its long-term management round the edge of each solar farm area, beside affected public footpaths and to protect the roots of mature trees. The spatial framework of the new Salt Cross Village should be respected by excluding from consideration for solar farm development all the fields north-east of the village across which "panoramic views" are proposed. The Applicant's proposals appear to have ignored topography. The conspicuous steep slopes near Hordley and Sansoms Farms (Northern Area), beside the B4027 and numerous public footpaths including the Oxfordshire Way (Akeman Street), should not be covered with solar panels.</p>	<p>The Applicant has submitted a Change Request 2 notification alongside submissions for Deadline 2 Notification of Intention to Submit a Request to Change the Application (Change Request 2) [PD-011]. This intends to capture certain scheme refinements and Order limits reductions in response to various feedback from interested parties. This includes areas where the Applicant is proposing to omit areas of solar installation. Full copies of application documents impacted by the proposed changes as flagged in the change request notification will be submitted alongside the formal Change Application.</p>	Historic_Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		There should be no solar panels on any of the escarpment on the east side of the Evenlode Valley. No solar arrays should be placed on the sloping sides of the ridge to the south of Church Hanborough village, crowned by a soaring limestone steeple ... seen across fields. The Southern Site, largely a highly visible north facing slope, is a totally unsuitable place for a solar farm and should be omitted from the proposal, except for the necessary substation, carefully sited. To clarify the location of these proposed omissions from the solar farm they are marked up on the 10 sheets of the Illustrative Masterplan dated 31. 01. 2025 (Figures 2.1 A-C, 2.2 A-F, 2.3).		
REP2-070	ICOMOS-UK	A. Blenheim Palace and Park WHS:ICOMOS-UK considers that the proposed Botley West Solar Farm would not have a direct impact upon the OUV of Blenheim Palace and Park WHS. The 1000 ha Park is enclosed by a high wall and continuous tree belt so that there are only two outward views from the Park. A southerly view from the Palace to Bladon Church is terminated by woodland on high ground only a kilometre beyond the southern boundary of the Park. An easterly view from the Column of Victory ends at the nearby houses of Woodstock, a view which also incorporates the view of Woodstock church over the lake beyond the Grand Bridge. The three proposed solar farms to the N-E and south of Blenheim Park are beyond these terminations. Page 45 of Appendix III of the Management Plan also identifies an 'Area of High Scenic Value' outside the south-west of the Park, which would be unaffected by the Solar Farm, though the N-W corner of the central block of the Solar Farm is not far away from the WHS.	The Applicant welcomes the comment from ICOMOS-UK that the proposed development would not have a direct impact on the OUV of the Blenheim Palace World Heritage Site.	Historic_Environment
REP2-070	ICOMOS-UK	B. Preliminary Assessment of Impact on Blenheim's Rural Landscape, surrounding the WHS and part of the historic Blenheim Estate: ICOMOS-UK also has an interest in sustaining the quality of the rural landscape in the UK, which in this instance contributes to the setting of the WHS. The attractive countryside which would be affected by the three blocks of the proposed Botley West Solar Farm is sensitive to downgrading. The Northern and Central blocks are not far from Blenheim WHS, while the Central and Southern blocks are in the NW of Oxford's Green Belt. While it is understood that it is national policy to provide solar farms as a contribution to counteracting global warming, it is surprising that there appears to be little national policy as to how suitable sites should be selected, so that in the perceptive words of The Gardens Trust: the choice of energy sites is currently unplanned and opportunistic. ICOMOS-UK's Cultural Landscapes and Historic Gardens Committee has asked one of its members, Hal Moggridge OBE VMH PPLI FIHort RIBA AADip, to assess the current proposals, an assessment endorsed by the committee, on the basis of a possible assumption that, in part at least, Botley West Solar Farm might be constructed. The assessment suggests that parts of the current proposals are altogether unacceptable because they impinge too closely upon adjacent villages, including the new Salt Cross village proposal. The proposals also appear to have ignored topography in a landscape with some significant escarpment and steep slopes, though river valleys have been respected. For these reasons the Committee strongly recommends that the following elements of the submitted proposals are omitted from the project, as cross hatched silver on dull green on the attached plans which are overlays on the Illustrative Masterplan of 31.01.2025.	<p>The proposed solar farm has been carefully designed to ensure that no part of the development would be visible in any of the defined key views out of the Blenheim Palace WHS, or indeed from any location within the WHS.</p> <p>The design of the proposed solar farm also considered the visibility of the scheme when viewed by visitors approaching the Blenheim Palace World Heritage Site (WHS). Some fields directly adjacent to the approach routes were withdrawn from the scheme as a result. This is further described in the Applicant's assessment of likely impacts and effects in respect of the Blenheim Palace WHS which is presented in the Heritage Impact Assessment (ES Appendix 7.4 [APP-141]). This assessment was undertaken in accordance with the 2022 guidance from UNESCO for the assessment of impacts on World Heritage Sites (Guidance and Toolkit for Impact Assessment in a World Heritage context), and the preparation of the report was carried out within an iterative process in consultation with Historic England.</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 'The park retains a complete, 18th century enclosing stone wall which protects its integrity, but views into and out of the site still provide key linkages between Blenheim and the traditional English countryside and villages surrounding it'.</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, 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. 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>	Historic_Environment

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REP2-070	ICOMOS-UK	<p>C. Some Landscape Issues of Concern:</p> <p>a. The developer is PVDP – Photovolt Development Partners – “Our team comprises highly qualified engineers and technicians with experience of designing and constructing solar parks worldwide ...” However, there seems to be an absence of a named independent landscape consultant, to ensure that the interests of local people and this attractive landscape receive proper consideration, though the most recent Illustrative Masterplan does show more landscape sensibility than its predecessors.</p> <p>b. Adequate space needs to be provided around public footpaths. The land beside the existing wooded east/west footpath across the northern solar farm proposal (Figure 2.1B) is sufficient to substantially seclude the path from adjacent land and to include mature trees; it is 25m wide. Beside the Withy Clump footpath south-east of Bladon (Figure 2.2A), it is 7-10 m from the outside of the adjacent thick hedge to the edge of the wood beside the path. These dimensions suggest that footpaths with solar panels on both sides should, as a standard requirement, run in an unobstructed width of 20-25m between the access tracks outside the fences around solar arrays. Where a path has solar arrays beside one side at least 12m should be left as a buffer beyond the access track alongside solar array fencing. The recent Illustrative Masterplan suggests that such standards would be accepted; they need to be enforced by planning conditions.</p> <p>c. The value of nearby houses would undoubtedly be reduced if this solar farm proceeds; compensation for this should be paid.</p> <p>d. No analysis appears to have been carried out to identify conflicts with obvious locations for future new housing associated with villages, necessary to achieve government policy related to desirable volume of new house building.</p> <p>e. In solar farms already built in this region heavy vehicles used during installation have tended to result in footpaths and adjacent ground (and presumably also land beneath the solar panels) being compressed and chewed up; this should be avoided by proper landscape specification and supervision.</p> <p>f. Page 17 of the November 2023 Leaflet states “a minimum 5m buffer zone for hedgerows, trees, ponds and woodland ...”; this is far too little to protect the roots of existing trees. British Standard 5837:2012 has recommendations about this which should be followed, which the recent Illustrative Masterplan appears to recognise.</p> <p>g. Quality of farmland might be an issue. “In assessing land use and agriculture, we have been conducting a number of Agricultural Land Classification surveys - 62% 3b; 38% 3a +.” (November 2023 Leaflet p19) but apparently not externally verified.</p> <p>h. Maintenance of the land beneath the panels and long-term retention of soil quality would be an important issue. This issue should be addressed at an early stage.</p> <p>i. Dense tall wide hedgerow planting should be a standard treatment along all the edges of the solar panel arrays.</p> <p>j. Some new footpaths are shown on the Illustrative Masterplan – a useful feature. A new north-south footpath at the bottom of the Evenlode valley east escarpment would be a desirable additional feature,.</p> <p>k. “At the end of Botley West’s operational life the land will return to its original use, and not become brownfield land ...” (November 2023 Leaflet p19). This is good policy which needs legally binding documentation. However, to make a significant contribution to countering global warming, any benefits of this electricity generation may not come to an end in the foreseeable future.</p>	<p>ICOMOS-UK state that ‘the proposed Botley West solar farm would not have a direct impact on the OUV of Blenheim Palace and Park WHS or its setting as identified by the map ‘Character of Setting of WHS’ on page 50 of Appendix III of the Management Plan’. (emphasis added).</p> <p>a. The LVIA [PDB-006] has been completed by suitably qualified Landscape Architects and peer reviewed. The illustrative masterplan [AS-020] has been completed with input and guidance from the Landscape Architects as a result of the LVIA. There is a benefit to the designer and the assessor to be the same or within the same team, as the landscape proposals are iterative, the design of the landscape proposals evolving as the assessment has identified potentially significant effects. The judgements that have been made are impartial. Members of the Landscape Institute operate under a Code of Practice which requires members to exercise impartial and independent professional judgement. Care has been taken within the assessment that reflects that duty. The judgements reached are based on a clear, balanced, reasoned and transparent explanation using the methodology to support those judgements.</p> <p>b. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape, such as much of Dornford Lane (PRoW 416/11/30) which passes through the middle of the northern section of the Project. Proposed mitigation would be retained, post decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW corridors, it is anticipated that views to the wider landscape and key features such as church spires would remain visible and available to users. The retention of proposed mitigation, designed in as part of the Project, would enhance the key characteristics of host landscape character areas and be in line with recommended guidelines and enhancements priorities. For example, LCA 4: Estate Parks and Farmlands, which covers much of the northern section of the Project, has the following priorities which the Project is taking account of and reinforcing: - retain mature boundary and roadside trees and replant as necessary; - manage and extend existing areas of woodland to maximise their wildlife and landscape value; - plant new blocks and belts of broadleaved woodland within estate farmland to reinforce typically enclosed, well-wooded character. (Page 35, West Oxfordshire Landscape Assessment 1998) Within the LVIA, the mitigation proposed as part of the Project would not alter the baseline view(s) as the planting would form part of a future baseline scenario. Planting that would alter the baseline views, particularly at Year 15, but also forms part of a baseline scenario are large areas of woodland planting being undertaken and in some cases planting within parts of the Blenheim Estate, in proximity to the Project. Areas of new woodland are shown on the Illustrative Masterplan [APP-062] and can be seen in many of the baseline views, such as Representative Viewpoint 10 [APP-065 and 066]. Where visible, the new woodland has been factored into the LVIA assessment of effects and it has been assumed that, like the proposed mitigation, this woodland would be established at summer Year 15 and so further minimise likely significant effects.</p> <p>c. Professional judgement and applicable guidance was used to determine a minimum 25 m buffer zone, from individual properties and settlements, and this has been incorporated into the Project design to soften viewpoints and minimise any likely effects. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which would further limit the effects of the</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>Project. Additional mitigation, as shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], was included to further screen available views from residential properties. Due to the low level of the Project and proposed mitigation, it is anticipated that there is no potential for any private views to be adversely affected to an extent that would result in a level of effect, which would trigger the requirement for RVAA. The impact of Glint and Glare upon residential amenity has been assessed within the Solar Photovoltaic Glint and Glare Study [APP-128] (Section 7.4). The Glint and Glare report identified a moderate impact upon residential amenity for seven dwellings for which mitigation was recommended. This recommendation was looked at and changes made to the design as required. These recommendations can be revisited to ensure that all have been considered properly, and any further mitigation can be added as necessary. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. The value of individual properties is not, in any case, a material planning consideration.</p> <p>d. The Landscape and Visual Impact Assessment [PDB-006], includes and assessment of cumulative effects at section 8.11.</p> <p>e. The oCoCP [APP-232 & 233] Annex A Outline Construction Traffic Management Plan, at paragraph 1.1.7, states that the purpose of the OCTMP is to set out how the numbers and routing of Heavy Goods Vehicles (HGVs) will be managed during the construction phase, how the movement of construction worker traffic will be managed during the construction phase, details of measures to manage the safe passage of HGV traffic via the local highway network and details of localised road improvements if and where these may be necessary to facilitate safe use of the existing local highway network.</p> <p>f. Mitigation measures are designed to minimise impacts on hedgerows. Ecologically important hedgerows are being protected by minimum 5 m buffers during construction. The loss is predicted to have a minor adverse effect. The remaining hedgerows are expected to retain their ecological function with suitable management. (Chapter 9: Ecology and Nature Conservation [PDB-008]). Protection measures are also applied to protect the veteran trees (15-times-stem-diameter buffer zones).</p> <p>g. The results of the ALC survey work have been discussed with Natural England as the statutory consultee in regard to ALC. In their Relevant Representation (REP1-087) Natural England consider that matters in relation to the best and most versatile land have been successfully resolved.</p> <p>h. The quality of the soil would be maintained through the implementation of a detailed Soil Management Plan(s) which would be developed in accordance with the Outline Soil Management Plan (APP-233) secured through Requirement 11 of the draft DCO (REP2-004)</p> <p>i. Proposed hedgerows, primarily located along existing retaining PRoW through and at the edges of the solar arrays, would be managed to an appropriate height (3m to 4m) which over time would help to screen some available views to the panels.</p> <p>j. Noted.</p> <p>k. Noted</p>	
REP2-081	Stop Botley West	<p>Alternatives Considered (APP-042 Chapter 5)</p> <p>4.1.1 The Applicant has not adequately addressed the issue of population density in the vicinity of the site in considering alternatives. There are far more residential properties near the site than claimed by the Applicant.</p> <p>4.1.2 The population density in BWSF site area is 4 to 6 times greater than solar farms elsewhere in the world, with approximately 12,274 residents within 1 km and 25,704 within 1.5 km of the site.</p> <p>4.1.3 The Applicant failed to consider or mention the proximity to dwellings in their assessment of alternatives, despite it being a key consideration in planning policy.</p>	<p>The density of the population, the potential for growth in housing and employment needs, and the need to supply existing and future communities, is a direct driver behind the need for renewable energy. The Botley West Project is part of a wider requirement to meet the UK's renewable energy needs, and alternatives were considered within the region and sub-region, having regard to the demand, capacity and grid connection potential, as set out in ES Chapter 5 Alternatives Considered [APP-042]. The proximity to residential property, as well as other key receptors, was a significant consideration in the evolution of the design.</p>	Alternatives_and_Roofs
REP2-081	Stop Botley West	<p>Historic Environment (APP-044 Chapter 7)</p> <p>4.2.1 The proposed BWSF development poses substantial risk to the historic environment, with potential harm to Blenheim Palace's setting, ancient villages, archaeological remains, listed buildings, and ancient woodlands.</p>	<p>The Applicant would refer to previous submissions which address many of the issues raised here by Stop Botley West, in particular the application documents</p>	Historic_Environment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>4.2.2 There is significant public and institutional opposition to BWSF due to both cultural heritage and environmental impacts. In particular there is widespread opposition to its proximity to the Blenheim Community Impact Report Page: 15/127Palace UNESCO World Heritage Site (WHS) not only locally. Over 500 public comments (90% against) from across the UK were received after a Mail Online article.(Ref: Author: [REDACTED], 10 November 2024).</p> <p>4.2.3 The Joint Local Impact Report (LIR), many times, highlighted concerns about significant harm to the Outstanding Universal Value (OUV) of Blenheim.(Ref: 7.2).</p> <p>4.2.4 Blenheim's setting is tied to a wider historical landscape with features like ancient rights of way (e.g., Dornford Lane) that illustrate the area's long-standing significance and cultural cohesion.</p> <p>4.2.5 No Archaeological Evaluation Report has been submitted by the Applicant, yet historical evidence indicates the potential for significant archaeological remains.</p> <p>4.2.6 Bladon Camp hillfort is a key Iron Age monument. Significant findings in Yarnton and Cassington show continuous settlement and ceremonial activity dating from 3800 BC. Extensive Saxon era settlements and features have been discovered in Yarnton, Cassington, and Worton.</p> <p>4.2.7 Photographs from the air during a drought in 1996 of Roman settlement at Sansom's Platt revealed a possible small town along Akeman Street, an important Roman road ignored by Applicant.</p> <p>4.2.8 The development area includes interconnected historic villages with roots dating back over 1,000 years. These villages are part of the Wootton Hundred, listed in the Domesday Book.</p> <p>4.2.9 BWSF would harm the setting of numerous heritage assetsincluding:5 conservation villages, 5 Grade I listed churches, 20 Grade II*listed buildings, 400+ Grade II listed buildings. Owners and residents of these buildings express concern over inadequate buffer zones and loss of historic character.</p> <p>4.2.10 Several individuals and organizations raised specific heritage concerns: risk of flooding to historic buildings, including churches, due to run-off from the solar development, loss of rural and cultural character, threatening daily public enjoyment, heritage value, and tourism.</p> <p>4.2.11 Several ancient woodlands would be affected: Burleigh Wood (recorded since 1420s), Pinsley Wood (mentioned in Domesday Book), Wytham Woods (with Saxon and medieval history).</p>	<p>submitted in relation to heritage impacts, and flood risk, and any subsequent revisions of those documents.</p> <p>As set out in the Applicant's Response to the Examining Authority's First Written Questions (ExQ1) [REP2-025], the Applicant intends to submit the reports on the results of the trial trenching at Deadline 5.</p>	
REP2-081	Stop Botley West	<p>Landscape and Visual Amenity -Glint & Glare Assessment (APP-045 Chapter 8 and APP-128 Appendix 4.4)</p> <p>4.3.1 The absence of a Residential Visual Amenity Assessment (RVAA) is a major flaw in the Applicant's submission.</p> <p>4.3.2 The Applicant's defined consultation zone includes over 22,000 properties, highlighting the extensive impact on the local population</p>	<p>The study area for the LVIA [PDB-006] is set at 5km from the edges of the Project site. Within this study area, the vast majority of residential properties would have no available views of the Project. As illustrated on the ZTV [APP-082].</p> <p>As with GLVIA3, there are no "hard and fast rules" on what constitutes degrees of significance, as judgements are made on a case-by-case basis. The Landscape Institute has provided guidance on residential visual amenity in Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment (LI TGN 2/19) which was applied to the assessment undertaken in Volume 3, Chapter 6: Landscape and Visual Resources [APP-069].</p> <p>Paragraph 1.5 of LI TGN 2/19 states that <i>"Changes in views and visual amenity are considered in the planning process. In respect of private views and visual amenity, it is widely known that, no one has 'a right to a view.' This includes situations where a residential property's outlook / visual amenity is judged to be 'significantly' affected by a proposed development, a matter which has been confirmed in a number of appeal / public inquiry decisions."</i></p> <p>LI TGN 2/19, paragraph 4.7, cites developments where residential visual amenity assessments (RVAA) have taken place. In general, the taller the structure proposed, the larger the study area, within which properties may experience effects that warrant a RVAA. LI TGN 2/19 recognises that distance from and the height of a proposed development is an essential part in judging significance. The Projects main built elements, the solar arrays, are a maximum of 2.3m.</p> <p>Paragraph 4.19, of LI TGN 2/19, provides further guidance on whether an RVAA is required <i>"Some examples of descriptions and descriptors that might be used [in describing impacts] include: 'blocking the only available view from a property', or 'overwhelming views in all directions'; and 'unpleasantly encroaching' or being 'inescapably dominant from the property.'"</i></p> <p>At paragraph A1.7 the same inspector noted that <i>"There needs to be a degree of harm over and above an identified substantial adverse effect to take a case into the category of refusal in the public interest. Changing the outlook from a property is not sufficient."</i></p> <p>Paragraph 2.2, of LI TGN 2/19, provides clarity on the terms overwhelming, overbearing and overly intrusive (and therefore in the public interest) <i>"one might use terms such as 'overwhelming/ overbearing' for tall structures, or 'overly intrusive' for a development overlooking a garden or principal room."</i></p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>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 [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], was included to further screen available views from residential properties.</p> <p>Due to the low level of the Project and proposed mitigation, it is anticipated that there is no potential for any private views to be adversely affected to an extent that would result in a level of effect, which would trigger the requirement for RVAA. Additionally, an RVAA was not required.</p>	
REP2-081	Stop Botley West	<p>Landscape and Visual Amenity -Glint & Glare Assessment (APP-045 Chapter 8 and APP-128 Appendix 4.4)The Applicant's focus on a narrow Glint and Glare assessment fails to represent the broader visual impacts on over 5,000 properties within 1km of the site.4.3.4 There are serious flaws in the Glint and Glare assessment wrongly assessing 00 of 690 properties as "no impact, no mitigation required" 4.3.5 Information required to fully check assessments for the Central and Southern sites is missing and has not been provided on request despite being promised.</p>	<p>The Glint and Glare Assessment has been carried out in accordance with industry best-practice and has considered the effect of existing and proposed vegetation where this would significantly screen views of reflecting panels. Section 8.2 of the Stop Botley West Community Impact Report states "<i>A glaring error is the total omission of around 30 properties on A4095 in Bladon from being assessed at all despite being within 100m of the panel area which would afford a very clear view of the panels</i>". These dwellings were not assessed as they are situated north of the north-most panel, and solar reflections are therefore not geometrically possible, even where views of the panels may exist. This is explained further in Section 5.2 of APP-128 Appendix 4.4. The Impact Significance Determination for dwelling receptors is presented within Appendix D of APP-128 Appendix 4.4. Dwellings are assessed as 'no impact' where no glare is geometrically possible or screening is predicted to significantly obstruct views of the panels. This is in line with Pager Power's Glint and Glare Guidance (4th Edition) and industry best-practice.</p>	Glint_and_Glare
REP2-081	Stop Botley West	<p>Landscape and Visual Amenity -Glint & Glare Assessment (APP-045 Chapter 8 and APP-128 Appendix 4.4)</p> <p>4.3.6 Numerous properties, including the UNESCO World Heritage site Blenheim Palace, will face significant visual disruption from the solar panels.</p> <p>4.3.7 The proposal threatens to industrialize previously agricultural and open landscapes, affecting local recreational public rights of way and overall quality of life.</p> <p>4.3.8 Residents express fears about the loss of amenity, wildlife habitats, and the negative impact on health and wellbeing due to the proximity of the solar farm.</p> <p>4.3.9 Proposed screening vegetation may not effectively mitigate the visual impact, leading to concerns about the long-term aesthetics of the area.</p> <p>4.3.10 The development poses risks to heritage assets, including listed buildings and conservation areas, with insufficient assessments of these impacts.</p> <p>4.3.11 There are serious concerns regarding the limited number of viewpoints and inadequate visual representations provided by the Applicant, which do not capture the full extent of the project's impact.</p>	<p>The impacts of the Project upon potentially significantly affected landscape and visual resources and receptors, within the 5 km study area, including Public Rights of Way, have been assessed within the submitted Landscape and Visual Impact Assessment [PDB-006].</p> <p>The landscape within which the Project is located is not nationally designated. The inherent physical characteristics and structure of the landscape would be retained and enhanced, as detailed on the Illustrative Masterplan [APP_062]. The project is considered fully reversible, unlike residential development. A solar farm retains the open characteristics of the existing landscape. The existing field boundaries, which provide structure to the landscape, would be retained and landscape features proposed as part of the scheme, further assist dividing the fields. These additional, proposed, landscape features would remain after the solar farm are removed.</p> <p>The Landscape and Visual Impact Assessment [PDB-006], includes an assessment of cumulative effects at section 8.11.</p> <p>The Parish of Cumnor, for example, in common with other areas within which the Project is located, is a changing landscape with existing built elements including Farmoor Reservoir visible within the landscape, along with substantial areas of newly planted woodland. It is acknowledged that the Project would result in a change to the local landscape character. But the perceptual as well as the physical characteristics / elements of the landscape, including open character, and existing field boundaries would be retained and enhanced as part of the comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228].</p> <p>Thirty-three photomontages have been produced as part of the application [APP-072 to APP- 080]. These demonstrate the impacts of the Project and illustrate that the majority of panoramic and more distant views available would be retained, due to the low height of the solar panels and the fact that the panel layout follows the existing contours.</p> <p>Existing public rights of way would be retained and have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays. As such, the public's access would not be restricted.</p> <p>Landscapes are not 'preserved in aspic' they are dynamic and ever-changing. Areas within the wider landscape, around the Project are rapidly changing, with agricultural fields in certain areas that have been / are being planted as woodland, as part of the Blenheim Estate's wider vision for the area, or the establishment of the Salt</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>Cross/Eynsham Vale garden village, to the north of the A40 and Eynsham, on agricultural land.</p> <p>Project Impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP_228]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which other time would limit available views to the solar arrays.</p> <p>Designed in mitigation including areas of woodland and lengths of hedgerow will, over time, maintain and enhance the natural connectivity with existing areas of planting and those which have been implemented by others. Such as extensive areas of woodland planting within Blenheim Palace Estate land.</p> <p>The 55 Representative Viewpoints, used within the submitted Landscape and Visual Impact Assessment (LVIA) [PDB-006], were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Impact Assessment [PDB-006]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [PDB-006]. It should also be clarified that although the assessment of landscape and visual effects is supported by the 55 Representative Viewpoints alongside the 33 visualisations (photomontages), the assessment conclusions are not based only on the viewpoints themselves.</p> <p>A detailed assessment of the likely impacts and effects arising from changes within the settings of heritage assets is presented in ES Appendix 7.5: Settings Assessment [APP-142], a Revision 1 version of this document, with additional information, was submitted at Deadline 2 [REP2-015].</p>	
REP2-081	Stop Botley West	<p>Ecology & Nature Conservation (APP-046 Chapter 9)</p> <p>4.4.1 The Local Community are fully engaged and concerned regarding the potential ecological impact of the BWSF proposal, with many voicing concerns in the Relevant Representations (RR) submitted. Trees and Ancient Woodlands</p> <p>4.4.2 There are serious concerns about the potential impact of the solar farm on notable, veteran, and ancient trees in the area. Risks of damage to these trees have not been adequately assessed by the Applicant, particularly regarding trees within ancient woodlands like Pinsley Wood and Burleigh Wood</p> <p>4.4.3 Local volunteer efforts and the Woodland Trust's Ancient Tree Inventory (ATI) indicate the presence of numerous veteran trees that the Applicant has overlooked in their assessments of risk due to proposed cable routes running close to them, potentially leading to damage or decline.</p> <p>4.4.4 The proposal's scale significantly isolates local ancient woodlands, with insufficient mitigation measures for the fragmentation of these habitats.</p>	<p>The Applicant's response to the Relevant Representations of the Local Community is set out in 11.4 Applicant's Responses to Relevant Representations (Rev P0) [REP1-020]. This includes with respect to issues relating to ecology and biodiversity.</p>	Trees_Plants_and_Flora
REP2-081	Stop Botley West	<p>Ecology & Nature Conservation (APP-046 Chapter 9)Wildlife</p> <p>4.4.5 The presence of solar arrays can severely impact bat populations, particularly given the area's high diversity of bat species. The conclusions drawn by the Applicant's ecological consultants regarding negligible impacts on bat populations are challenged in the light of recent scientific literature that indicates significant negative impacts of solar arrays on bat populations. Community Impact Report Page: 17/127</p> <p>4.4.6 Local residents report regularly observing the presence of various bird species, including breeding and wintering birds, and they are concerned about the loss of habitat connectivity due to the solar farm's implementation. The replacement of arable land with solar arrays is seen as detrimental to farmland birds, particularly skylarks, which are already in decline. The proposed compensation measures, such as skylark plots, lack credibility and effectiveness.</p> <p>4.4.7 Negative impacts of the solar farm on brown hares and hedgehogs due to their reliance on arable fields for foraging and breeding. The disturbance to badger sets due to construction activities.</p> <p>4.4.8 The area has not been adequately surveyed for reptiles, which could lead to significant oversight in assessing the ecological impact. Concerns about the proposed development's proximity to known populations of Great Crested Newts and their habitats and connectivity of habitat required.</p>	<p>The Applicant's response to the Relevant Representations of the Local Community is set out in 11.4 Applicant's Responses to Relevant Representations (Rev P0) [REP1-020]. This includes with respect to issues relating to ecology and biodiversity.</p>	Local_Ecology_and_Nature

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		4.4.9 Relevant Representations from local residents express concerns about the ecological impacts of the proposal. Many highlight the potential disruption to local wildlife, including birds, bats, and other species, as well as the loss of significant habitats.		
REP2-081	Stop Botley West	<p>Hydrology and Flooding (APP-047 Chapter 10.)</p> <p>4.5.1 The area between the Thames and Cherwell rivers faces serious challenges posed by numerous water courses and surface water flooding.</p> <p>4.5.2 The region frequently experiences flooding, affecting homes, businesses, and transport due to both river and surface water runoff.</p> <p>4.5.3 Farmers and locals have implemented various drainage methods, but these are becoming less effective with increasing severe rainfall.</p> <p>4.5.4 Construction activities, including piling for solar panels, will damage existing drainage systems, exacerbating flooding issues across large areas.</p> <p>4.5.5 Cumnor has areas at risk of fluvial flooding, particularly near the River Thames and Farmoor Reservoir, classified within Flood Zones 2 and 3. Several areas in Cumnor are also at risk of surface water flooding, particularly during heavy rainfall events.</p> <p>4.5.6 Begbroke's Rowel Brook's flood risk assessment is recommended to ensure development does not increase flooding potential.</p> <p>4.5.7 Bladon has experienced repeated flooding, particularly due to surcharging from local rivers and uncontrolled drainage runoff.</p> <p>4.5.8 Cassington faces significant pluvial flooding risks due to runoff from surrounding fields, especially along Elm's Road.</p> <p>4.5.9 In Wootton and Woodstock flooding primarily arises from the River Glyme.</p> <p>4.5.10 Local residents express concerns that new developments, particularly solar farms, will worsen flooding due to increased runoff and disruption of natural drainage systems</p>	<p>An FRA has been prepared, which discusses the existing flood risk and in the context of the development; Volume 3 Appendix 10.1: Flood Risk Assessment [APP-166]. This includes consideration of climate change in the sequential design of the solar farm and Volume 3 Appendix 10.2: Conceptual Drainage Strategy [APP-167]. These reports that flood risk will not be increased and has been undertaken in line with the NPPF and NPS.</p> <p>The Surface Water Drainage Strategy for the Project also details how runoff from proposed new hardstanding areas will be managed throughout the Project.</p> <p>The FRA concludes that as a result of the solar Project there is no increase flood risk on-site and off-site in line with the NPPF and NPS [APP-166].</p>	Hydrology_and_Flood_risk
REP2-081	Stop Botley West	<p>Traffic and Transport (APP-049 Chapter 12)</p> <p>4.6.1 Traffic congestion due to the proposed development near residential areas is a serious concern to many residents.</p> <p>4.6.2 The SBW survey of February 2025 on Residential Amenity showed a significant percentage of residents reported already experiencing traffic congestion due to roadworks, Blenheim Palace traffic and rush hour congestion. In this survey, the majority of respondents (84%) believe that traffic will be significantly affected during construction and (38%) believe that traffic will be significantly affected during operation.</p> <p>4.6.3 There has been inadequate evaluation of road safety assessments and economic impacts due to increased delays from construction activities, particularly for local residents.</p> <p>4.6.4 Several roads, including B4027, B4449, and B4017, are identified as problematic due to their narrowness and heavy usage, raising safety concerns for residents and businesses.</p> <p>4.6.5 Access challenges for construction: Limited options for safe access points to the central site are noted, with concerns over the proposed re-routing of heavy vehicles through unsuitable roads</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 includes assessments of the impact of construction traffic upon road safety and driver delay (congestion, including the impact upon driver delay from installing cables within roads) and concludes that the construction traffic would not create any significant effects upon traffic and transport receptors. Thus, the assessments do not predict any significant economic impacts due to increased delays from construction activities. 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. The access strategy has assessed the geometries, layout and alignments of the road network and it restricts construction HGVs to only suitable parts of the road network, which includes the B4027, B4449, and B4017. The access strategy 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] restricts construction HGVs to only suitable parts of the road network. 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 [REP2-004]. Section 12.4 of ES Volume 1, Chapter 12 [APP-049] sets out that when the Project is operational it does not require any manned facilities and requires only infrequent maintenance activities that will be undertaken by a light vehicle (typically a 4x4) daily / weekly. It sets out that the potential impact of additional vehicle movements on traffic and transport receptors during operation and maintenance of the Project is unlikely to result in significant effects.</p>	Traffic_Transport_and_Access
REP2-081	Stop Botley West	<p>Noise and Vibration (APP-050 Chapter 13)</p> <p>4.7.1 No assessment has been conducted on how noise affects residential amenity.</p> <p>4.7.2 The applicant has underestimated the noise impact during construction and operation phases, particularly from pile driving activities.</p>	<p>Our response to each point is provided below; 4.7.1. This is incorrect. Chapter 13 Noise and Vibration (APP-050) includes an assessment of the potential impact on residential amenity during the construction, operational, and decommissioning stages. 4.7.2. This is incorrect. Chapter 13 Noise and Vibration (APP-050) has been prepared using the most up to date and detailed information we have, and considers the maximum design scenario. 4.7.3. The construction works will take 2 years to</p>	Noise_and_Vibration_Impact

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<p>4.7.3 The applicant claims construction noise is temporary and limited, but this is disputed, with concerns that noise will have a more than transitory impact across a wide area affecting multiple communities.</p> <p>4.7.4 Power Converter Stations will emit significant noise, yet their cumulative impact has not been appropriately assessed.</p> <p>4.7.5 Many sensitive receptors, including schools and residential properties, were omitted from the assessment of noise impact during operation.</p> <p>4.7.6 The construction phase lacks a comprehensive noise impact assessment for residential receptors, despite over 5,000 properties being within 1km of the site.</p> <p>4.7.7 Residents have expressed concerns about noise disturbances impacting their daily lives and well-being, particularly during construction.</p> <p>4.7.8 Local councils and residents have raised issues regarding the noise from Power Converter Stations and the need for a thorough cumulative noise impact assessment.</p>	<p>complete, and will occur in various parts of the site at different times. Therefore, construction works are not a long term impact, and will be transient.4.7.4. This is incorrect. Chapter 13 Noise and Vibration (APP-050) includes an assessment of the noise impact from all of the PCS units and substations operating concurrently. Subsequently, the cumulative noise from all items of plant operating has been assessed. Furthermore, the assessment utilises the maximum design scenario. 4.7.5. Chapter 13 Noise and Vibration (APP-050) includes representative receptors, and those which are considered to be worst affected. As is stated in the chapter. It is possible that other receptors will be affected. However, the impact at these other receptors will be equal to, or less than the impact at the receptors which have been included and therefore be lower LSE.4.7.6. The construction phase assessment includes an assessment of the noise impact from each part of the construction works, and the assessment considers the construction noise and vibration impact at receptors close to the site boundary. Even at these receptors, the noise and vibration impact has been found to be not significant. Therefore, it is not necessary to consider receptors at a greater distance, as sound attenuates as it propagates over distance.4.7.7. This is noted. However, Chapter 13 Noise and Vibration (APP-050) does not identify any significant adverse effects.4.7.8. This is noted. However, Chapter 13 Noise and Vibration (APP-050) does not identify any significant adverse cumulative effects.4.7.8. This is noted. However, Chapter 13 Noise and Vibration (APP-050) does not identify any significant adverse cumulative effects.</p>	
REP2-081	Stop Botley West	<p>Socio Economics (APP-051 Chapter 15)</p> <p>4.8.1 Potential socio-economic impacts of the Botley West Solar Farm (BWSF) on local businesses and the economy are highlighted with concerns from various Community Impact Report Page: 19/127stakeholders regarding the negative effects on tourism, local businesses, and community well-being.</p> <p>4.8.2 An SBW survey indicated that 64% of businesses felt their income would be significantly or moderately affected by BWSF, with 73% concerned about the appeal of their business.</p> <p>4.8.3 Tourism contributes over £282 million annually to the local economy, and BWSF could negatively impact local hospitality and tourism-related businesses.</p> <p>4.8.4 Several businesses, including Oxford Capital Partners and Wolfram Research, expressed concerns about the aesthetic degradation of the area and its impact on attracting talent and investment.</p> <p>4.8.5 Specific businesses at risk, such as the London Oxford Airport Aviation School and businesses by Farmoor Reservoir, could face closure or loss of appeal due to BWSF.</p> <p>4.8.6 Residents report difficulties in selling properties, with many citing the BWSF as a reason for reduced interest or lower offers.</p> <p>4.8.7 Increased traffic and noise pollution from the development pose risks to local health and safety, particularly for businesses like North Oxford Crematorium and Hill End Forest School.4.8.8 The applicant has not adequately assessed the broader economic impacts of BWSF on local businesses and tourism.</p>	<p>The Socio Economics ES Chapter 15 [APP-052] shows that unemployment will reduce and economic output will increase. It is estimated that 424 direct FTE jobs will be created in the local travel study area across all phases. The ES Chapter calculates £17m of Gross Value Added (GVA) for the Study Area during the construction phase, £64.7m during the operation phase, and £17m during the decommissioning phase. The Outline Skills, Supply Chain & Employment Plan [APP-218] also states intentions for the Applicant to work with local suppliers to procure products and services where possible. The Applicant will build upon the relationships formed with Thames Valley Chamber of Commerce and OxLEP to help facilitate this. The Outline Skills, Supply Chain & Employment Plan [APP-218] also states the intent to engage with local residents through 'Local Recruitment' initiatives as well as 'Apprenticeships' and 'Other Workforce Training'. 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 this effect across all phases is assessed as not significant. Mitigation measures aimed to enhance the appeal of the Site include new routes through the solar PV arrays, which aim to encourage visitors by providing: information boards (with details of new routes); wildflowers and hedgerows (for visual screening); children's fun trails and education boards (e.g. on wildlife, heritage and solar energy).</p> <p>Overall the Project will have significant business economic and resident benefits.</p>	Socio_economics
REP2-081	Stop Botley West		<p>The outline Public Rights of Way Management Plan (APPR-232) provides the outline measures to ensure that the network of PRoW through the Site can be maintained during the construction phase of the Project and identifies measures that may be required in relation to fencing, surfacing and reinstatement. The Plan identifies those routes affected and the measures proposed for each route at this stage, subject to the confirmation of the detailed design of the Project. The Applicant will continue to engage with OCC regarding measures for PRoW and active travel as part of the Project. Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape, such as much of Dornford Lane (PRoW 416/11/30) which</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>passes through the middle of the northern section of the Project. Proposed mitigation would be retained, post decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRow corridors, it is anticipated that views to the wider landscape and key features such as church spires would remain visible and available to users. The retention of proposed mitigation, designed in as part of the Project, would enhance the key characteristics of host landscape character areas and be in line with recommended guidelines and enhancements priorities. For example, LCA 4: Estate Parks and Farmlands, which covers much of the northern section of the Project, has the following priorities which the Project is taking account of and reinforcing: - retain mature boundary and roadside trees and replant as necessary; - manage and extend existing areas of woodland to maximise their wildlife and landscape value; - plant new blocks and belts of broadleaved woodland within estate farmland to reinforce typically enclosed, well-wooded character. (Page 35, West Oxfordshire Landscape Assessment 1998) Within the LVIA, the mitigation proposed as part of the Project would not alter the baseline view(s) as the planting would form part of a future baseline scenario. Planting that would alter the baseline views, particularly at Year 15, but also forms part of a baseline scenario are large areas of woodland planting being undertaken and in some cases planting within parts of the Blenheim Estate, in proximity to the Project. Areas of new woodland are shown on the Illustrative Masterplan [APP-062] and can be seen in many of the baseline views, such as Representative Viewpoint 10 [APP-065 and 066]. Where visible, the new woodland has been factored into the LVIA assessment of effects and it has been assumed that, like the proposed mitigation, this woodland would be established at summer Year 15 and so further minimise potential effects.</p>	
REP2-081	Stop Botley West	<p>"Public Rights of Way (APP-045, -052, -053 Chapters 8, 16 & 17</p> <p>4.9.6 Health and Well-being Impacts. Walking in nature provides proven mental and physical health benefits; these will be lost if PRowWs are enclosed by panels and hedges.</p> <p>4.9.7 Applicant's Health Chapter (Chp 16) lacks specific analysis of health impacts from PRow degradation.</p> <p>4.9.8 The SBW February 2025 survey on the use of PRowWs showed that 94% predict a significant or moderate impact from PRow closures. Nearly 50% would drive elsewhere to walk, increasing traffic and emissions. Only 11% would continue using PRowWs enclosed by fences and high hedges.</p> <p>4.9.9 Numerous residents provide deeply personal accounts of reliance on PRowWs for managing conditions like PTSD, myoclonus, and neurodivergence.</p> <p>4.9.10 Mental health and safety concerns, especially for lone walkers and vulnerable users, are common. Residents criticize the lack of consideration for non-physical impacts, such as sensory overload and emotional well-being.</p> <p>4.9.11 No quantified assessment of visual or health impact. Proposed new footpaths/cycleways are seen as poorly designed and unsupported locally."</p>	<p>We acknowledge Stop Botley West's concerns regarding disruption to PRowWs and its impact on access to green space and nature.</p> <p>The Applicant provided Responses to Relevant Representations [REP1-020], including rows titled: • 'Access to open space, public rights of way, recreation, and physical activity' (pdf page 74 of 545) • 'Perceived personal safety concerns from high fencing along walking routes' (pdf page 87 of 545); and • 'Loss of Public Footpaths and Access' (pdf page 227 of 545).</p> <p>Appendix 1 of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-019] also discusses how regard has been given to the experience of change for those with heightened sensitivities associated with neurodiversity.</p> <p>The Outline Code of Construction Practice [APP-232] Annex B sets out the Outline Public Rights of Way Management Strategy.</p>	Human_Health
REP2-081	Stop Botley West	<p>Public Rights of Way (APP-045, -052, -053 Chapters 8, 16 & 17 Tourism and Economic Impact. Loss of scenic PRowWs may negatively affect tourism, which benefits from the area's walking appeal and proximity to attractions like Blenheim Palace.</p> <p>4.9.13 Local economic and health consequences are underestimated by the Applicant.</p>	<p>The Socio Economics ES Chapter 15 [APP-052] evaluates 'Change in Visitor Economy'. It recognises potential disruption and loss of visitor numbers, particularly during construction. However the overall significance of this effect across all phases is assessed as not significant. Mitigation measures aimed to enhance the appeal of the Site include new routes through the solar PV arrays, which aim to encourage visitors by providing: information boards (with details of new routes); wildflowers and hedgerows (for visual screening); children's fun trails and education boards (e.g. on wildlife, heritage and solar energy).</p>	Socio_economics

2.3 Public / Landowner

Table 2.3: Applicant's Responses to Representations provided at Deadline 2 – Public / Landowner

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP2-085	The Chancellor Masters and Scholars of the University of Oxford	<p>Applicant's Response regarding Change in use of Productive Agricultural Land.</p> <p>Response: Reference has been made in the Applicant's response to the Relevant Representations that 'the Code of Construction Practice would ensure that farming within landholdings will continue to operate effectively during the construction phase', however, until such time as cable routes, detailed design and construction phasing are finalised it is impossible to be able to guarantee this. The University understands work continues to narrow down the proposed cable routes but it appears that is some time away until this can be confirmed, accordingly uncertainty will persist.</p>	<p>The purpose of the Outline CoCP [APP-232] is to set out a written set of standards and measures that will be implemented during the construction process to ensure a consistent and effective approach to managing potential environmental impacts in order to minimise nuisances to communities and to safeguard the environment. The final CoCP will be in substantial accordance with the principles established in the Outline CoCP and will be agreed with the relevant planning authority prior to commencing the construction phase. In particular, in relation to the requirements for individual land holdings, Section 1.6.7 identifies that an "Agricultural Liaison Officer will be appointed in time for commencement of pre-construction activities and will be the dedicated point of contact for ongoing engagement about practical matters with landowners, occupiers and their agents during the pre-construction and construction phases. The scope of works for the Agricultural Liaison Officer(s) will include but is not limited to:</p> <p>Arranging meetings with landowners, occupiers or their agents where considered necessary to minimise disruption where possible to existing farming regimes and timings of activities.</p> <p>Undertaking site inspections during construction to monitor working practices including supervising and monitoring the implementation of soil handling methodologies as per the Outline Soil Management Plan.</p> <p>Oversee any aftercare required post-construction. Should agricultural land quality issues occur during the construction or aftercare period, these will be raised with the Agricultural Liaison Officer and investigated.</p>	Agricultural_Land_Use
REP2-085	The Chancellor Masters and Scholars of the University of Oxford	<p>Applicant's Response in relation to Wytham Woods</p> <p>Response: Reference has been made to there being 'no significant effects identified from representative viewpoints within or at the edge of Wytham Woods' and while this may be the case from certain viewpoints it is also likely that there will be many viewpoints from which the completed scheme will have an impact on the character of the landscape particularly the views to the south from the elevated position of Wytham Woods, (145m above sea level), towards Cumnor, (120m above sea level). As advised by [REDACTED], (Rural Surveyor for the University of Oxford), at the Issue Specific Hearing 1 on 15th May 2025, the University owns land occupied by Hill End Outdoor Education Centre, (copy Tenancy Plans attached at Appendix 1), which has operated nature-based outdoor learning and activities from the site for over 100 years. The site runs from the B4044, Eynsham to Botley Road, (70m above sea level), rising steeply up to the north to Cowleaze Copse, (over 135m above sea level), with far reaching views to the south, (as shown on the attached marked-up plan at Appendix 2). The concern here is that during the construction phase there will likely be significant adverse impact on access to and enjoyment of the site owing to increased traffic, road closures and associated works. Post completion the scheme will impact the enjoyment of the existing far-reaching views to the south, which are a particular highlight for visitors to the 'High Dorm' at Hill End. The Applicant's comments in relation to mitigation strategy as relate to the Wytham Woods/Stroud Copse SSSI are noted and the University look forward to reviewing detailed Method Statements, Work Plans and Phasing Schedules as these become available.</p>	<p>Wytham Woods is a privately owned woodland, with access by appointment. As such, there is no general public access. Although the Project will be partly visible in views from more open parts of the woodland and at the edge of it, no significant effects have been identified from Representative Viewpoints within or at the edge of Wytham Woods. Including Representative Viewpoints 42, 43 and 44 [APP-065 to 066]. A photomontage (winter and summer) was completed to illustrate possible effects from Representative Viewpoint 42 [APP-079]. The views to Wytham Wood from Cumnor village are not interrupted by the solar farm.</p>	Landscape_and_Visual_Impacts
REP2-085	The Chancellor Masters and Scholars of the University of Oxford	<p><i>Applicant's Response in relation to Cable Routes</i></p> <p>Response: <i>The University has been engaging with the Applicant in respect of a preferred route for the cable corridor over its landholding. Discussions are still at an early stage but the University has confirmed to the Applicant its favoured cable route which would be the shortest and therefore is anticipated to provide the lowest impact. Further survey work is to be undertaken along the proposed route to ensure the feasibility of the same. This will provide comfort for the Tenant and University and allow engagement around easements, mitigation strategy, likely timing, remediation strategy and cropping for future harvest years. In summary, while the Code of Construction Practice and Compensation Code are noted as providing mechanisms aimed at protecting a Landowners interest, the University feels that these should not be relied upon in isolation and that ongoing engagement and communication between the Applicant, the Landowner and their Tenants is the best way to keep all informed and to ensure that multiple interests are accommodated in scheme design, phasing and planning.</i></p>	<p>The applicant has been engaging with the University regarding the cable route over its landholding. These discussions seek to reach an agreed route with a legal easement being proposed for the cable corridor. Further survey works will be undertaken, to determine that the agreed route, and any mitigation required. The purpose of the Outline CoCP [APP-232] is to set out a written set of standards and measures that will be implemented during the construction process to ensure a consistent and effective approach to managing potential environmental impacts in order to minimise nuisances to communities and to safeguard the environment. The final CoCP will be in substantial accordance with the principles established in the Outline CoCP and will be agreed with the relevant planning authority prior to commencing the construction phase.</p>	Cable_Routes

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP2-087	Antony Scott Houghton	<p>Submission ID: 36914 I am submitting this response as an individual, and not on behalf of any other body. To summarise, I wholeheartedly agree with the response provided by Cumnor Parish Council, and urge the Examining Authority to read their response in full.</p> <p>Question: Q1.1.5 – List of cumulative projects</p> <p>Response: I am aware of three other projects in Cumnor which are significant enough to require consideration cumulatively with the Proposed Development. These are the proposed National Grid substation, which is the subject of other questions, the Red House Farm solar power station, which is adjacent to this proposed development and is currently under consideration by Vale of White Horse District Council, and the floating solar power station on Farmoor Reservoir which Thames Water intend to build.</p>	The Applicant notes Mr Houghton's comment. The Applicant has included the developments mentioned in its assessment as set out in Cumulative Effects and Inter-relationships, ES Chapter 20 [APP-057], including Red House Solar Farm and the Thames Water floating solar proposal. The Applicant has provided similar comments in response to the ExA Q1 response from Cumnor Parish Council, in document EN010147/APP/13.3 .	Cumulative_Impacts
REP2-087	Antony Scott Houghton	<p>"Submission ID: 36914I am submitting this response as an individual, and not on behalf of any other body. To summarise, I wholeheartedly agree with the response provided by Cumnor Parish Council, and urge the Examining Authority to read their response in full.</p> <p>Question: Q1.5.8 – Accuracy of the Book of Reference, Land Plans and Points of Clarification</p> <p>Response: I agree with Cumnor Parish Council that the uncertainty in the boundaries due to the scale of the maps and the thickness of drawn lines is a great concern, and causes several areas where exact impact cannot be assessed. The Human Health assessment seems to imply that the impacted areas of the Vale of White Horse would only see impact from a substation, and not from arrays or cable corridors, however the plans say that all three would be in the area. There also seems to be confusion over whether the areas stated are parishes, parish wards, or district council wards, clarification on this matter would be greatly appreciated."</p>	We acknowledge your concerns regarding boundaries for the Cumnor village. Please see our Deadline 3 response, [reference EN010147/APP/13.4] to the Cumnor Parish submission [REP2-048] for further details on this.	Human_Health
REP2-087	Antony Scott Houghton	<p>Response: Submission ID: 36914I am submitting this response as an individual, and not on behalf of any other body. To summarise, I wholeheartedly agree with the response provided by Cumnor Parish Council, and urge the Examining Authority to read their response in full. The apparent lack of engagement with Thames Valley Police is also a concern, particularly given the increased amount of crime being seen at similar solar installations elsewhere, and the fact that smaller applications decided by district councils have requested this engagement.</p>	As set out in the Applicant's response to REP1-064 from Cumnor PC, the issues of Crime and Community Safety were considered at the scoping stage, as set out in Scoping Report [APP-125] Table 7.18 and Table 7.19. That analysis concluded that actual and perceived crime effects were unlikely, including during operation, and were therefore scoped out in line with proportionate assessment. Thames Valley Police and Crime Commissioner was consulted at the Scoping stage, and again at the PEIR and targeted consultation stages, along with the Thames Valley Local Resilience Forum, but no consultation responses were received. Similarly there was no Relevant Representation received from TVP post submission. Whilst the risk of theft, of materials and equipment, and of vandalism, cannot be completely avoided the Applicant is proposing security measures (fencing, infra-red sensors, and higher levels of protection for the project substations), as described in Table 6.4 of Chapter 6 of the ES [APP-043], that are considered proportionate and appropriate for the Project, and align with those measures usually deployed to protect solar farms.	Project_description_and_Design_parameters
REP2-089	Bojan Ivanovic	<p>Response: Flooding Risk:[to summarise] The area surrounding Jericho Farm and Worton Farm is subject to frequent and significant flooding, particularly along Yarnton Road. When the land is compacted under solar infrastructure, it will lose its natural infiltration capacity—the soil will cease to act like a sponge—converting moderate rainfall into high-velocity surface runoff. flash floods have led to the closure of our community foul water treatment facility, which must be shut down to prevent reverse flow and mechanical failure. This renders basic residential functions—such as using toilets, showers, or washing machines—unavailable for extended periods.</p>	A response was previously provided by the Applicant in relation to concerns raised at Jericho Farm and Worton Farm [REP1-131].	Hydrology_and_Flood_risk
REP2-089	Bojan Ivanovic	<p>Response: Compulsory Acquisition [to summarise] I also submit a strong and reasoned objection to the developer's attempt to obtain compulsory powers over Order Land parcels 9-06, 9-07, 9-09, 9-10, 9-11, and 9-12. These rights include temporary land use and permanent new rights, as well as the suspension or extinguishment of easements, servitudes, and private access rights—all ostensibly to facilitate underground cabling.</p>	The electricity generated by the photovoltaic modules installed on parcels 9.08, 9.13, and 9.16 can only be transmitted to the main body of the solar site—beginning at parcel 9.04—via 33 kV cables laid along a single technically viable and spatially feasible route. This connection corridor runs over the road-aligned parcels 9.06, 9.07, 9.09, 9.10, 9.11, and 9.12. The selection of this route is dictated by current site conditions and engineering constraints. There is no alternative routing that meets the necessary electrical, spatial, and operational criteria for establishing this connection. The Applicant has carried out a detailed alternatives assessment as set out in Chapter 5: Alternatives Considered [APP-042]. Section 5.9 of that chapter deals with 'Cable Corridor Route and Laying Methods'. The Applicant's full case on compulsory acquisition powers sought, including in relation to the cable route, is set out in the Statement of Reasons [AS-015].	Site_selection_and_Cable_Route_Alternatives
REP2-089	Bojan Ivanovic	<p>Response: Green Belt [to summarise] In this case, the developer appears to be exploiting the NSIP process to create a permanent new infrastructure corridor in the Green Belt under the veil of renewable energy development. This constitutes an</p>	As the generating capacity of the project is greater than 50MW, the Planning Act 2008 requires it to be dealt with under the DCO process as it is classified as a Nationally Significant Infrastructure Project. That statutory process incorporates consultation, including with the host authorities, and the detailed consideration of local impacts and benefits, including those affecting the Green Belt. The	Green_Belt

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		abuse of the statutory process, a clear threat to both planning integrity and public safety, and an unacceptable precedent for future Green Belt degradation.	Examination process enables further engagement between the Applicant and Interested Parties and the Applicant welcomes the opportunity to respond to queries.	
REP2-090	Bojan Ivanovic	Response: 1. Misleading Justification of National Need and Disregard for Viable Alternatives The Statement asserts that Botley West is essential for meeting national net-zero goals, yet it systematically ignores more sustainable, less intrusive options. Vast untapped potential exists in distributed solar installations on rooftops and brownfield sites, particularly those near large energy users such as warehouses and data centres, which would significantly reduce grid stress and transmission losses. The UK, with some of the least favourable photovoltaic conditions globally (World Bank, Global PV Potential), is poorly suited for sprawling solar farms on productive farmland. Unlike locations such as Andalusia or parts of Italy, where solar farms are optimally located near major energy consumers, Botley West's isolated position necessitates costly grid reinforcement, new substations, and inefficient battery backup, raising costs for consumers.	The UK government has set a target of a minimum of 70GW installed solar generation by 2035. This requires at least 5GW per annum of new generation. The current annual installation rate is 1GW. Rooftop solar panels are part of the solution, but the large part of the target will be achieved by constructing large ground-mounted solar farms. This is the cheapest form of generation available to the UK, as well as being the quickest to deploy. NGET is building a new substation at Farmoor for four customers in an area of the country where the distribution network is at capacity.	Needs_Case
REP2-090	Bojan Ivanovic	Response: 2. Loss of Prime Agricultural Land and Threats to Food Security The project threatens extensive areas of Grade 3a and 3b agricultural land—classified by DEFRA as “best and most versatile”—a vital resource for food production amid growing global insecurity. The conversion of this productive farmland into an industrial-scale solar facility represents a permanent shift away from farming towards speculative land banking.	The assessment of the effects of the Project on agricultural land are presented in Chapter 17 of the ES - Agricultural Land Use and Public Rights of Way [APP-054] . The proposal includes the retention of agricultural use of the land within the area of the solar panel infrastructure, using conservation grazing as outlined in the Outline Landscape and Ecology Management Plan [APP-235] . Blenheim Estate already apply conservation grazing locally within other areas of land and the capability and experience is therefore already available to apply this type of management with the Project.	Agricultural_Land_Use
REP2-090	Bojan Ivanovic	Response: 3. Ecological Damage and Questionable Biodiversity Claims of “biodiversity net gain” are often superficial and fail to compensate for the real habitat loss. The Botley West development will fragment habitats, compact soils, disrupt hydrology, and degrade ecosystems, with token “wildlife-friendly” measures insufficient to mitigate such damage. The lack of rigorous, peer-reviewed environmental assessment and the cherry-picking of soil surveys further undermine the credibility of these claims.	The approach to BNG assessment is set out in Appendix 9.13 Biodiversity Net Gain Assessment [APP-162] . The methodology with respect to the terrestrial component of BNG has been discussed and agreed with Natural England and follows the government's guidance. The BNG Assessment is currently being updated with the watercourse module at the request of a number of Interested Parties.	Local_Ecology_and_Nature
REP2-090	Bojan Ivanovic	Response: 4. Inadequate Mitigation of Landscape and Heritage Impacts The scale of the project will cause profound alterations to the rural landscape, impacting multiple districts, including areas near Blenheim Palace, a World Heritage Site. Proposed visual mitigations 2 such as planting and bunding are minimal and will fail to prevent significant harm to cultural heritage and landscape character.	Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228] . All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape, such as much of Dornford Lane (PRoW 416/11/30) which oases through the middle f the northern section of the Project. Proposed mitigation would be retained, post decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW corridors, it is anticipated that views to the wider landscape and key features such as church spires would remain visible and available to users. The retention of proposed mitigation, designed in as part of the Project, would enhance the key characteristics of host landscape character areas and be in line with recommended guidelines and enhancements priorities. For example, LCA 4: Estate Parks and Farmlands, which covers much of the northern section of the Project, has the following priorities which the Project is taking account of and reinforcing: - retain mature boundary and roadside trees and replant as necessary; - manage and extend existing areas of woodland to maximise their wildlife and landscape value; - plant new blocks and belts of broadleaved woodland within estate farmland to reinforce typically enclosed, well-wooded character. (Page 35, West Oxfordshire Landscape Assessment 1998) Within the LVIA, the mitigation proposed as part of the Project would not alter the baseline view(s) as the planting would form part of a future baseline scenario. Planting that would alter the baseline views, particularly at Year 15, but also forms part of a baseline scenario are large areas of woodland planting being undertaken and in some cases planting within parts of the Blenheim Estate, in proximity to the Project. Areas of new woodland are shown on the Illustrative Masterplan [APP-062] and can be seen in many of the baseline views, such as Representative Viewpoint 10 [APP-065 and 066] . Where visible, the new woodland has been factored into the LVIA assessment of effects and it has	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			been assumed that, like the proposed mitigation, this woodland would be established at summer Year 15 and so further minimise potential effects.	
REP2-090	Bojan Ivanovic	Response: 7. Deliberate Obfuscation of Flood Risk and Community Safety Concerns The flood risk in Worton, Cassington, and surrounding areas is neither speculative nor abstract; it is a well-documented, recurring problem. The proposed solar infrastructure on sloped terrain near Jericho and Worton farms, which currently functions as a natural water sponge, would be replaced by impermeable surfaces, soil compaction, and inadequate drainage. Combined with blocked ditches and undersized culverts, the development will exacerbate surface runoff and flood risks, threatening homes, public infrastructure—including foul water treatment plants—and public health. The Statement fails to provide thorough hydrological modelling or credible mitigation, a serious omission given increasing extreme rainfall due to climate change. Placing underground electrical cables in known flood-prone areas raises additional safety concerns, including electric shock hazards, which the Statement inadequately addresses.	The project design seeks to minimize the impact on local hydrology by incorporating best practices in land preparation and drainage management. While impermeable surfaces may increase runoff, the proposal includes sustainable drainage systems (SuDS) intended to mitigate this effect. We are committed to refining these systems at detailed design. Regarding the culverts and ditches a response was provided to these concerns [REP1-131]. 275 kV cables are protected from flood-related risks and electric shock hazards through a combination of high-performance insulation, waterproof metallic sheaths, mechanical armouring, careful burial and encasement, effective grounding, and advanced fault protection systems. These measures ensure the cables remain safe and operational even in areas prone to flooding.	Hydrology_and_Flood_risk
REP2-090	Bojan Ivanovic	Response: 8. Misuse of the Nationally Significant Infrastructure Projects (NSIP) Framework and Green Belt Erosion The aggregation of over two dozen non-contiguous parcels into a single NSIP application, connected only by cabling and ownership, constitutes a blatant manipulation of the planning system designed to circumvent local planning scrutiny. The project encroaches significantly on Green Belt land, undermining long-standing legal protections and threatening the Green Belt through what can only be described as permanent industrialisation—contrary to claims of “very special circumstances.” This erosion of the Green Belt is part of a broader policy shift cloaked in ambiguous and Orwellian rebranding attempts, such as the term “Grey Belt.” Tenant farmers are being displaced or pressured under Blenheim’s commercial influence, further disrupting local rural livelihoods. The endgame here is not clean energy, but instead land value uplift for Blenheim and their affiliates. Once agriculture is driven out and the solar optics have done their job, the land will be primed for “reclassification”—industrial, commercial, or “affordable” residential development, all conveniently aligned with Blenheim’s longer-term interests. The fact is that the project sponsor will enjoy 40 years of risk-free, subsidised income, courtesy of a hidden environmental tax on consumers, and will then walk away with an exponentially inflated asset.	These points have been answered by the Applicant, in the earlier comments on Mr Ivanovic's representation, and in previous responses to Relevant Representations [REP1-020] and ExA Questions on the Green Belt [REP2-025].	Green_Belt
REP2-090	Bojan Ivanovic	Response: 9. Financial Interests, Corporate Overreach, and Lack of Transparency The project's complex financial structure—with involvement from German entities and opaque Special Purpose Vehicles—appears designed to obscure true beneficiaries and evade accountability. Blenheim and its affiliates stand to gain subsidised, risk-free income for 40 years, culminating in inflated land values ripe for future industrial or residential reclassification. Public funds and trust are exploited to support a private revenue stream, with guaranteed profits masked behind green levies paid by consumers. This financial model benefits shareholders at the public's expense, violating principles of transparency and fairness.	SolarFive Ltd is a limited company registered in England and Wales at Companies House. Full details of the company are available for anyone to view on the Companies House website. The Applicant is funding the DCO application from its own resources; no public funds are involved. At the end of the DCO consent, the site returns to agricultural use.	Funding_and_PPA
REP2-090	Bojan Ivanovic	Response: 10. Flawed Cost-Benefit Framing with Material Property Value Losses An authoritative London School of Economics (LSE) study demonstrates that proximity to solar farms reduces the value of adjacent residential properties by significant margins (LSE Grantham Research Institute, 2021). This impact is wholly downplayed by the developer. Botley West will materially damage property owners through visual intrusion and loss of rural amenity.	As referred to in the Applicant's response to Relevant Representations [REP1-020] 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
REP2-093	Calum Miller MP	Response: Landscape and Visual Impact There are several communities for whom the scheme represents a material loss of amenity. Under the current proposals, solar panels will come close to their village boundaries and be highly visible from properties within the village. The scheme will fundamentally alter the environment for these communities. Within my constituency, these are particularly Bladon, Cassington, Church Hanborough and Wootton. The Applicants argue that the impact on landscape is minimal and can be screened. Yet map 4 articulates how the topology of the area means that large areas will be visible. I urge inspectors to pay close attention to these factors – and this map – on their site visit and to consider whether the claims of the Applicants are valid.	Professional judgement and applicable guidance was used to determine a minimum 25 m buffer zone, from individual properties and settlements, and this has been incorporated into the Project design to soften viewpoints and minimise any likely effects. Individual properties were looked at on a case-by-case basis. And in some cases, Purwell Farm for example, it was considered appropriate to have a greater buffer zone. Many of the individual properties have existing vegetation within their boundaries which would further limit the effects of the Project. Additional mitigation, as shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228], was included to further screen available views from residential properties. Due to the low height of the Project and proposed mitigation, it is anticipated that there is no potential for any private views to be adversely affected to an extent that would result in a level of effect, which would trigger the requirement for RVAA. The impact of Glint and Glare upon residential amenity has been assessed within the Solar Photovoltaic Glint and Glare Study [APP-128] (Section 7.4). The Glint and Glare report identified a moderate impact upon residential amenity for seven dwellings for which mitigation was recommended. This recommendation was looked at and changes made to the design as required. These recommendations can be revisited to ensure that all have been considered properly,	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			and any further mitigation can be added as necessary. It should also be noted that there are a number of changes to the layout of the solar array, being considered due to historic environment, safety and land use/legal matters, see the Change Notification (Notification of Intention to Submit a Request to Change the Application (Change Request 2) [PD-011] . These will also assist in minimising adverse effects on landscape and visual resources and receptors. Particularly, but limited to, areas around Bladon.	
REP2-093	Calum Miller MP	Response: Flood risk The flooding in September 2024 significantly affected this area and I draw inspectors' attention to the concerns of WODC around hydrology and flood risk. As they state, this is a particular issue for the village of Cassington. I know residents there are deeply concerned that the mitigation measures will not be sufficient – in the context of predicted increases in extreme weather conditions over the next 45 years (the proposed duration of the scheme) –to avoid an increased flood risk to homes and businesses in that area.	The prepared baseline modelling for Cassington was undertaken using appropriate climate change scenarios. This is detailed in Appendix 10.5: Surface Water Modelling Report [APP-172] . The proposed mitigation would be designed in accordance with the relevant climate change allowance. In addition, an FRA has been prepared, which discusses the existing flood risk in the context of the development; Volume 3 Appendix 10.1: Flood Risk Assessment [APP-166] . This includes consideration of climate change in the sequential design of the solar farm and the conceptual surface water drainage strategy. It demonstrates that the development will not increase flood risk.	Hydrology_and_Flood_risk
REP2-093	Calum Miller MP	Response: Historic Environment The scheme will be very largely situated on land owned by the Blenheim Estate. The setting of this UNESCO World Heritage Site (WHS) is key. Blenheim set a ten-year plan in 2017 that committed it to maintaining and safeguarding this status. That document specifically ruled out situating solar panels in the broader setting of the Palace site. UNESCO guidance [2015 WHS Operational Guidelines (para 13)] is clear that the "broader setting" of a site is "related to its role in supporting the Outstanding Universal Value" of a WHS. I am genuinely perplexed as to how the Trustees have arrived at the view that a solar scheme of this scale so proximate to that precious setting was appropriate. As the WODC submission makes clear, there are other heritage assets in the area covered by the proposed scheme and constituents have raised with me their concern that the scheme does not adequately take these into consideration.	The likely impacts and effects on the OUV of the Blenheim Palace World Heritage Site as a result of the change within its setting are described in ES Appendix 7.4: Heritage Impact Assessment [APP-141] . The Applicant has worked closely with Historic England to identify potential changes to the proposed development that would further reduce or eliminate any harm to the OUV of the WHS. As a result, further changes are now set out in Change Request Notification 2 [PD-011] . If accepted, these changes would require a revision of ES Appendix 7.4: Heritage Impact Assessment [APP-141] to be submitted to the Examination at an appropriate deadline.	Historic_Environment
REP2-093	Calum Miller MP	Response: Pre-commitment to 840MW The proposers of the scheme mount the argument that they must deliver 840MW as this is what they promised National Grid in return for the commitment to provide a new connection to the grid. The first point is that this was presumptuous of the developers. They should have sought to design the right scheme for this setting and sought consent to that, rather than designing the whole project to meet an arbitrary output target that they are unwilling to be flexible about. I would therefore urge inspectors to ask two questions of the Applicants: 1. What is the minimum output you could install under the terms of your contract with National Grid and still be able to obtain a connection to the grid? 2. Taking account of the pace of advances in solar panel efficiency, what output capacity do you estimate you would have by the date of first energy production if solar panels were placed on the whole area proposed in the scheme? I strongly suspect that inspectors will discover that (1) there is flexibility in the output required by National Grid; and (2) the developers have proposed more capacity than they require even to meet the 840MW output target. If so, there is no requirement for the scheme to be at its current scale.	The Applicant acknowledges the concerns raised. The 840 MW figure represents the design envelope for the agreed grid export capacity to NG, which reflects the upper limit assessed within the Environmental Statement to ensure flexibility and accommodate future technology advances. This capacity aligns with National Grid's connection offer, which is based on technical and commercial parameters agreed through a formal application process. The precise installed capacity will depend on final panel selection and design optimisation at the time of procurement.	Principles_of_Solar_Development_and_Amount_of_Electricity_Generated
REP2-093	Calum Miller MP	Response: Community Benefit The other area where the response of the Applicant has been disappointing is in the discussions with local community representatives around community benefit. I appreciate this is not a planning consideration but, since the developers have highlighted it in their submission, I believe it is appropriate for inspectors to pay attention to it, as you did at your initial hearing. From an initial, derisory, offer of £50,000 per year, I note that the developer is now proposing to make a payment of £525,000 per year. If that is a ten-fold increase, it would take a further increase of similar scale to match the community benefit contribution proposed by the Scottish Government for onshore renewables: at £5000 per MW of installed capacity, that would amount to £4.2m for an 840MW scheme. In the hearing, the Applicant's lawyer argued that it is not fair to compare a solar plant with onshore wind. However, the Government's Working Paper proposes to treat all technologies the same when it comes to the level of developer contribution from renewables. I have repeatedly raised this issue in the House of Commons and spoken with the Energy Minister about it. I am pleased that the Government has indicated an intention to set a mandatory level of community benefit contribution for new renewable energy schemes in England. The Working Paper published by the Government on 21 May consults on illustrative examples of either £1000 per MW capacity at £1 per MW/h output – which is around one fifth of the level adopted in Scotland. I anticipate that the level will change before a final figure is adopted and I hope it will be closer to the Scottish model than that proposed by the UK Government. What is, in any case, clear is that developers should be taking this likely direction of government policy into consideration even in	The Applicant consulted with the LPAs, parish councils and numerous local stakeholders before agreeing to raise the annual community benefit fund to £525 per MW, £441,000. This will be £16.5 million at today's prices over the contractual term of the project. This a sustainable fund which will benefit those who live near the solar farm. The Applicant sought to balance the desire to grant a portion of the revenue of the project to local residents with the need to ensure the long-term viability of the solar farm, given the high volatility of UK electricity prices and the long-term commitment that the fund represents.	Community_Benefits_and_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		those schemes that are consented before any new regulation takes effect. Prior to that point, the Government indicates that developer contributions will be voluntary. I think the developers of Botley West should expect to pay an amount of at least the consulted upon government figure (i.e. £840,000 for an 840MW plant) than the offer they have made so far. Inspectors will have noted the evidence provided by [REDACTED] of South Hill Community Energy Trust on 13 May that the Trust is providing ten times this figure - £10,000 per MW – as community benefit each year. I would therefore urge inspectors to ask the Applicants:3. What is the basis for selecting £625/MW as the level of annual community benefit from this scheme? Why is a scheme of this scale unable to offer a more generous contribution to the local community, in line with the examples set by the Scottish Government or, more locally, by South Hill Community Energy?		
REP2-093	Calum Miller MP	Response: Financial structure and viability While financial viability is not, strictly, a planning consideration, I trust that inspectors will spend some time considering the structure of the scheme to satisfy themselves that the undertakings made by the Applicant will be delivered and upheld through the construction of the project and its operation over 40 years. The heart of the project appears to be a long lease of land by Blenheim Estate to PVDP/ Solar Five Ltd. Given this appears to be a civil contract, it is surprising that the Applicant has applied for Compulsory Purchase Order powers over the whole area of the proposed site. This may be precautionary, but – were it to be enacted – it would put at risk the undertakings given to the local community by Blenheim Estates that they will remain the long-term stewards of the land and, given this, that they have a strong interest in the management of the project. PVDP/ SolarFive Ltd are under no obligation to retain the site for the full 40 years of operation. They may choose to sell the project if consented either prior to or after construction. Under these circumstances, it would be critical to ensure that the undertakings given by the Applicant (for example on good management, ecology and community benefit) were enforceable with any subsequent owner. I would therefore urge inspectors to ask two further questions of the Applicants:4. Why have the Applicants sought compulsory purchase powers for the whole site when the landowner (Blenheim Estates) has said it is supportive of the project AND given undertakings to the local community that it will steward the land across the lifetime of the project?5. What form of binding commitments do the Applicants propose that would give confidence to the communities affected by the scheme that the scheme operators (whether the Applicants or any further party to whom the scheme is sold) will uphold the undertakings made during the application and consultation process?	Notwithstanding where an option or lease agreement has been reached, it is necessary for the Applicant to be granted the compulsory acquisition powers included in the DCO. This is set out in the Statement of Reasons [APP-021] . Should the DCO be granted, the conditions set out in the order will apply irrespective of ownership and are enforced by the local planning authorities, as with any planning consent.	Land_Agreements
REP2-094	Calum Miller MP	Response: [Summary of response in REP2-093]	This is a summary of the REP2-093 - dealt with in the Applicant's response above - and does not need a further comment.	Acknowledgment
REP2-098	Deborah Mackin	Response: The application shows their intention is to have cables situated along the road on or next to our land on [REDACTED]. It is not clear where the red line wants to be. This lack of clarity which given the suffering by all adjacent appears slap dash, not fully considered.	The Applicant notes the concern raised and is committed to providing clarity on the proposed cable route alignment along Cumnor Road. The final cable corridor location will be refined through ongoing survey work and landowner engagement. The current red line boundary is intentionally broad to allow for flexibility during this process, but all final alignments will be confirmed in consultation with affected parties and designed to minimise disruption. The Applicant is committed to a considered and transparent approach throughout.	Cable_Routes
REP2-098	Deborah Mackin	Response: If passed, the cable digging will encroach and damage the roots of mature trees in our field and all along [REDACTED] Has this been considered?	The approach to the protection of existing trees during works to install cables is set out in the Strategic Arboricultural Impact Assessment & Method Statement [REP1-044 to REP1-047] . This includes along the Cumnor Road.	Trees_Plants_and_Flora
REP2-098	Deborah Mackin	Response: It is not clear which side of the road is proposed and whether the planning application has taken into consideration the enormous water pipes which cross into our field and many other fields in this vicinity; this includes land owned by [REDACTED] and Deborah Mackin, land owned by [REDACTED], [REDACTED]. These are owners of land that I know house Thames Water pipes because I see them (Thames Water) wandering from field to field whenever they have a problem which is often-many times each year. Has this problem been considered? This application seeks to erase a huge area of historically, quality agricultural land that is irreplaceable but also specifically troublesome given Thames Water's network around the reservoir and Beacon Hill.	The applicant confirms that, prior to construction, all known utilities and services will be identified, and that works will be planned accordingly to avoid or protect existing infrastructure. Pre-construction utility surveys will be undertaken to map and confirm the presence and alignment of existing underground services, including water mains, gas pipelines, and electric cables. These surveys will inform the final construction layout and may trigger design modifications or exclusions to maintain safe working distances or access provisions for third-party infrastructure.	Project_description_and_Design_parameters
REP2-099	Dermot Magee	Question: Q1.5.8 – Accuracy of the Book of Reference, Land Plans and Points of Clarification Response: 1. I have not received any communication from the Applicant as to the compulsory purchase or permissions they are seeking to carry out works on or	This is answered in the Applicant's response below for the same REP2-099 .	Land_Agreements

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		adjacent to our property at , Worton, located off the Cassington Yarnton Road (Central site 2.2D)		
REP2-099	Dermot Magee	<p>Question: Q1.5.8 – Accuracy of the Book of Reference, Land Plans and Points of Clarification</p> <p>Response: 2. I note from the most updated Illustrative Master Plan submitted to the Inspectorate that no solar panels will be sited in the southerly section of the field that borders my property.(Central Area - 2.60 on the map). It is important for me to understand if this section of the field is to be left for wildlife and agricultural purposes or if PVDP has other uses in mind, such as storage of materials etc. We have not received any communication on what is planned for this section of the field.</p>	If any operational or temporary use—such as for storage, access, or land management—is proposed, all relevant landowners and tenants will be contacted and consulted in advance. The Applicant is committed to maintaining clear communication and transparency with neighbours and land interests throughout the development process.	Project_description_and_Design_parameters
REP2-099	Dermot Magee	<p>Question: Q1.5.8 – Accuracy of the Book of Reference, Land Plans and Points of Clarification</p> <p>Response: 3. We have not been informed of any drainage assessments at by PVDP which has a history of surface water flooding, documented by CPC and WODC. If solar panels are located in the northern section of the adjacent field (Central Area 2.60) there is a potential risk of increased surface water flooding during heavy rainfall due to the higher elevation of fields north of our property. See attached photo of flooding in 2024 from heavy rainfall. All 4 properties are serviced by a treatment plant which has the potential to fail if overwhelmed by surface water flooding. Residents will need to be informed of how these matters will be addressed and resolved including alternative facilities during repairs and what compensation will be made for repairs or replacement parts.</p>	The design of the Solar PV ensures that any water that would have fallen on to the land in the pre-existing baseline will continue to do so during the Project. A comprehensive literature review of how solar farms affect runoff and mitigation measures used during the design are outlined in the Conceptual Drainage Strategy for the site within ES Volume 3 Appendix 10.2: Conceptual Drainage Strategy [APP-167]. The FRA and ES concludes that there is no increase in flood risk anticipated as part of the Scheme. As such it is not appropriate nor required to provide compensation in regard to off-site treatment plants.	Hydrology_and_Flood_risk
REP2-099	Dermot Magee	<p>Question: Q1.5.8 – Accuracy of the Book of Reference, Land Plans and Points of Clarification</p> <p>Response: 4. There has been no communication with us as to the compulsory purchase or permission that they may be seeking on or adjacent to our land regarding cable routes. I would point out that if the Applicant intends to lay cabling along the Cassington Yarnton highway residents who live at will need to fully understand what is proposed, including the culvert that lies under the private access road, what remedial work will be carried out, how access to and from the properties will be managed and what compensation will be paid to the owners of the affected private driveway.</p>	The Applicant has consulted with the PIL throughout consultation issuing both a s42 consultation letter dated 28.11.2023, a targeted consultation letter dated 13.06.2024 and a s56 letter dated 07.01.2025 with regard to the ongoing consultation for the development, on the basis they have a Right in respect of access over land along Yarnton Road. The cable route in this location will either use the verge or the road, which is in the ownership of OCC and is public highway extent. If a culvert/access is in private ownership, then the cable route will not infringe on the private ownership.	Land_Agreements
REP2-099	Dermot Magee	<p>Question: Q1.5.8 – Accuracy of the Book of Reference, Land Plans and Points of Clarification</p> <p>Response: 5. Our front garden abuts the Cassington Yarnton road. We have not received any communication from the Applicant of the extent to which they will seek to compulsory or with permission to remove trees, hedges and verges that currently screen our property from the excessive traffic noise. Photo attached.</p>	The approach to the protection of existing trees during works to install cables is set out in the Strategic Arboricultural Impact Assessment & Method Statement [REP1-044, REP1-045, REP1-046, REP1-047]. There is no intention to remove trees/hedgerows/verges during cable laying. Any areas where works are to be undertaken in proximity to such features will be subject to appropriate measures, as set out in the Method Statement, to ensure no impact occurs.	Trees_Plants_and_Flora
REP2-107	Harry St John	Response: In particular the state of play between the applicant and NGET Ltd and the licence to connect - we have been told that the licence expires in October 2027 but that negotiations are in hand to extend that to October 2028. Has that extension now been formally granted and if so it should be produced in evidence to the Inspectors? Given the patent uncertainty of where NGET proposes to build their main substation, highlighted by the Inspectors questions, and that NGET have stated they aim to apply for planning consent and CPO powers some time in 2026, it seems to me that extending the connection licence to October 2028 may still prove inadequate, given the sheer scale of this whole project.	The Applicant is in regular contact with NGET. The application to vary has not yet been signed but is likely to have a connection date of October 2028 or Q1 2029. The position is set out in the Statement of Common Ground with NGET. NGET and the Applicant has a signed Bilateral Connection Agreement with NGET and has deposited significant securities with NGET as part of the agreement.	Grid_Connection
REP2-107	Harry St John	Response: WODC will tell you that they have just launched the next stage of their Local Plan review with a range of draft new policies which may well have a bearing on this process. See Policy PL6 on pages 70 to 73 of the draft plan on which consultation has just started (see the WODC website). In addition Blenheim Estate have recently made a planning application to Cherwell DC for a further 500 or so new dwellings on land south and east of Woodstock which, taken with the solar power station proposal, merely adds to the cumulative impact on the wider setting of the Blenheim Palace and Park WHS status.	The Applicant's comments on the weight to be given to emerging Local Plans, as well as the cumulative assessment of proposals submitted since the DCO was submitted, are set out in response to the OHA's comments on ExAQ1 1.1.3 and 1.1.5.	Cumulative_Impacts
REP2-107	Harry St John	Response: Meanwhile planning permission has been granted for another solar farm in West Oxfordshire, on land between New Yatt and Witney - largely in the parish of Hailey. This is a much smaller solar project at 24MW on about 100 hectares(250 acres). Interestingly the developer estimated 20 lorries delivering	This site was considered as part of the cumulative assessment, and features in the West Oxfordshire Figure 20.1, showing Tier 1, 2 and 3 projects, appended to Chapter 20 [APP-057]	Construction_period_and_methods

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		materials using local roads over about 12 months construction time - compare that to the applicants proposals and forecasts.		
REP2-107	Harry St John	Response: As you know my written rep (REP1 ref no 147) highlighted the impracticality of grazing sheep on a commercial basis in large fields covered in solar panels, especially when most of the land is currently arable and so needs sowing to grass before the panels are installed. The Inspectors have rightly asked for detailed drawings/sample photos of the panels and structure of the tables, showing the uprights and struts that reinforce the whole panel structure. I suspect these drawings will show how difficult it could prove for sheep to graze under the panels and be easily managed i.e. gathered to move from one field to the next etc. The Inspectors questions about panel heights on sloping ground highlight the lack of design detail and consequent impact on the ability to graze and manage the grass sensibly.	The comment is noted. Conservation grazing of sheep is a common practice on solar farms and is encouraged by the NFU.	Project_description_and_Design_parameters
REP2-107	Harry St John	Response: The piles down to up to 3metres securing the tables/panels may well damage land drains laid (at about 1metre depth) in the last 50 years or so - Blenheim should surely have kept the plans of where land drains were laid especially on the higher land in the Central section, where soils may have a higher clay content - either side of the Bladon to Cassington on Burleigh and Purwell Farms; most of the Southern section has heavier clay soils and is likely to have been drained too.	The inclusion of pre-works and post-works surveys of flood assets, including field drainage, has been added as a commitment to an updated 6.3 - ES Chapter 10 - Hydrology and Flood Risk [APP-047] as embedded mitigation. This commitment will also ensure that field drainage is restored for the operational life of the development. The outline Soil Management Plan, submitted as part of the outline Code of Construction Practice [APP-233] contains measures to limit impacts to soil resources, wherever practicable, through the application of recognised best practice measures in soil management. This includes the conservation of soil resources, the avoidance of damage to soil structures, aftercare measures for areas used for conservation grazing, and reinstatement on decommissioning.	Hydrology_and_Flood_risk
REP2-107	Harry St John	Response: Draining of thousands of acres took place across England in the 1970s/80s (with Govt grants of 40 to 60%) and in many cases raised grade 3B land to Grade 3A quality by reducing the waterlogging problems prevailing before. The ALC maps prepared by MAFF date from the mid-1970s are notoriously inaccurate apart from being small scale - i.e. they don't show the level of detail you need to inform this sort of examination, nor did they differentiate between Grades 3A and 3B.Laying of cables at 1.5 metres deep will almost certainly cut some land drains. If not mended, drainage problems will occur leading to vehicle rutting, soil structure damage or erosion and potential surface water flooding . REP1 (ref no 162 and 163) highlight the inadequacies of the applicants expert report on BMV issues and it will be interesting to see the applicants response to your questions on BMV stats and provide plans with more precise areas of each Grade.	The Agricultural Land Classification survey work carried out has been undertaken using the MAFF 1988 ALC guidelines . Subgrades 3a and 3b have been mapped as part of this survey work and the distribution of these grades is shown in the ALC and Soil Survey Report [APP-223]. In terms of land drainage, the ALC guidelines the assessment of the Wetness Class of the soil assumes that soils have an appropriate underdrainage system and that there are satisfactory outfalls and therefore the presence of appropriate drainage management measures are assumed to be in place within the wetness assessment.	Agricultural_Land_Use
REP2-107	Harry St John	Response: I have raised the reasonable life expectancy of timber fencing posts - circa 25 years - there are c. 65 miles of fencing proposed and that means a lot of timber posts c 3 metres long having to be replaced roughly half way through the life of this project - a major construction task, with consequential impacts on the land and local highway traffic during any replacement exercise.	The Applicant's updated outline Operational Management Plan [REP2-017] submitted at Deadline 2 contains more information on the Applicant's approach to maintenance. The Applicant also provided a brief response to ExA Q 1.17.11 assist in clarifying various documents that identify transport mitigation. Maintenance for fencing, trees and hedgerows, and indeed the agricultural use of the land, will have generated agricultural contractor traffic, even in the absence of a solar farm.	Traffic_Transport_and_Access
REP2-107	Harry St John	Response: One assumes the wire netting will either be galvanised or plastic coated (black not green should be conditioned in any DCO) and might last the full life of the power station. NGET Ltds REP1 ref 106 states that it is possible to connect into the 400KV grid anywhere - so along with the Inspectors, I await with interest why the applicants did not consider sites further west along the 400KV pylon line, where there are large tracts of generally flat land potentially better suited to solar farm use - without the heritage, Green Belt and landscape negative impacts that apply here, let alone other land in sunnier parts of the UK	Detailed design, including fencing materials, finishes, and colours, will be secured through the detailed executive Design and later submissions. Regarding alternative sites along the 400kV line, options to the west were reviewed; however, constraints including grid availability, land ownership, and deliverability influenced the selection of the current site despite its sensitivities.	Site_selection_and_Cable_Route_Alternatives
REP2-107	Harry St John	Response: The Inspectors questions in Section/Para 1.5 relating to Compulsory Acquisition are very pertinent, so the applicants response is awaited with interest. There are surely examples here where a simple solution to the claimed need to use of CA, is just to remove certain parcels of land not owned by the three main owners; the impact on the whole project would be slight to negligible - as others have stated, any solar power station generating over 250KW is potentially viable and so even reducing this one from the claimed 840MW to say 750 MW would not seriously impact the viability. The applicants have made minimal effort (contrary to what they claim) to reduce the size of the of their site, despite so many bodies and individuals requesting this for sound reasons. The applicant continues to seek compulsory powers despite Blenheim and other owners confirming they have signed options for leases and so are very unlikely to renege on such agreements given the sums at stake. The compelling case for the grant of CA powers has yet to be made and I await the applicants response on this key point, along with the other	The Applicant's case in support of the compulsory acquisition powers being sought, including the compelling case in the public interest, is set out in the Statement of Reasons [AS-015]. Further specific responses have also been provided by the Applicant in the Applicant's Response to the Examining Authority's First Written Questions (ExQ1) [REP2-025].	Land_Agreements

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		responses to the questions in Section /Para1.5, in particular the detailed assessment of potential compensation claims that could arise		
REP2-107	Harry St John	Response: The continuous thread running through the applicants case remains the lack of clear information and reliable analysis on so many issues. Indeed in some instances misleading representation has become apparent; in addition complete lack of transparency on funding at this stage, highlights further the obvious failure by the applicant, on too wide a front, to make an applicant that bears proper scrutiny. One therefore begins to wonder whether the issue of award of costs in whole or part might come into consideration by the Inspectors - it would seem to me that when reading the Government guidance on this there are elements of this case which fit the criteria required. The Inspectors 92 page questionnaire exposes the shortage or inaccuracy of information one might reasonably expect of an applicant for a NSIP.	The Applicant notes this comment but respectfully disagrees with it. On 13 December 2024 the Planning Inspectorate accepted the Application. The letter [PD-002] states that the application "satisfied the acceptance tests under section 55 of the Planning Act 2008". The Examination is primarily conducted by written questions from the Examining Authority. The number of questions in the Examining Authority's First Written Questions [ExQ1] is comparable to the number asked in similar solar DCO applications.	Funding_and_PPA
REP2-107	Harry St John	Response: I would ask for the Inspectors to address this matter at some point - maybe when the next hearings occur in October. The Inspectors questions in Section /Para 1.6 focus particularly on the quality and clarity of the photomontages (see also the comments made by WODC in the joint host authority LIR). It is clear to anyone who saw the montages at the consultation stage that they were hopelessly inadequate but the applicant failed to improve on them hence you and many others criticism of them - I myself told and then emailed the applicants agent director [REDACTED] in emails in February2024, that they were inadequate and had omitted many key views and montages because they realised they were not helpful to their case. I can show the Inspectors the email exchange, if that would assist. I have already suggested that Blenheim Estate and or the applicant provide drone 360 degree photo shots from the top of the Column of Victory in Blenheim Park and the various listed church spires and towers, to enable all to better understand the visual impact of what is proposed - we await to see if this is produced.	The Representative Viewpoints within the LVIA [PDB-006] have been taken from publicly accessible locations, such as public lights of way and public roads. The top of the Column of Victory in Blenheim Park and / or local church spires are not publicly accessible locations and therefore not a view representative of visual receptors included within the LVIA. In addition, verified aerial photography is not possible, and was not requested by any of the host authorities during consultation or scoping.GLVIA3 only mentions aerial imagery twice, in the context of computer generated 3D models (paragraphs 8.28 and 8.29). Moreover, GLVIA3 explains that such models "do not necessarily represent the way that people would experience the change [in view] and so can be misleading in an assessment context" (GLVIA3, paragraph 8.29). This is especially true of people within vehicles including aircraft, travelling at speed on the approach to, or taking off from airports. The transient nature of potential views available from the air and the enclosed nature of the aircraft would reduce the sensitivity of the visual receptor to such a degree that there is no potential for significant effects. The 55 Representative Viewpoints, used within the submitted Landscape and Visual Impact Assessment (LVIA) [PDB-006] , were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Impact Assessment [PDB-006]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080] . These were considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149] . It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [PDB-006] . It should also be clarified that although the assessment of landscape and visual effects is supported by the 55 Representative Viewpoints alongside the 33 visualisations (photomontages), the assessment conclusions are not based only on the viewpoints themselves.	Landscape_and_Visual_Impacts
REP2-107	Harry St John	Response: The Inspectors questions in Section/Para 1.7 raise some further points. If a new Roof W is created or one stopped up , what happens when the solar panels are removed and the land restored in 40 years - are the closed paths reopened and new paths closed? Are such changes permanent or temporary for c 40 years?	The outline Public Rights of Way Management Plan (APPR-232) provides the outline measures to ensure that the network of PRoW through the Site can be maintained during the construction phase of the Project and identifies measures that may be required in relation to fencing, surfacing and reinstatement. The Plan identifies those routes affected and the measures proposed for each route at this stage, subject to the confirmation of the detailed design of the Project. The definitive PRoW would be maintained and remain in place. The proposed additional permissive routes would remain in place throughout the operational period of the Project.	Public_Right_of_Way
REP2-107	Harry St John	Response: Surely a condition should be imposed on the DCO whereby any tree felled is replaced with a new tree and monitored for five years until established (replaced again if it should die).	The details of any necessary tree and hedge removals, including the replacement of dying or diseased plants, will be advanced through the detailed Landscape and Ecology Management Plan, and associated arboricultural management schedules. This is secured under Requirement 6 of Schedule 2 of the draft DCO [REP2-004] .	Trees_Plants_and_Flora
REP2-107	Harry St John	Response: In Section /Para 1.8 the sky lark plots provision displays basic lack of understanding of skylark behaviour - it might be more effective to leave whole fields available for them to nest in greater safety rather than pepper potting plots everywhere. The swans that roost during winter months in the arable fields east of the Lower Road need to be accounted for especially in the context of planes flight paths and air safety.	The provision of skylark plots is to provide a diversity of habitat structures within the panel arrays by including areas of bare ground that can freely colonise with plants from the soil seed bank each season; it is not intended that such features be used as nesting habitat for this species. By keeping them bare earth at the start of the year, they will increase the diversity of habitat structure available and therefore the ecological niches available for the invertebrate prey that is important for skylarks feeding chicks during the breeding season. Areas of the Project site that have been removed to protect buried archaeology will be managed as open grassland to ensure that birds such as swans can still use the Project site during winter months.	Public_Right_of_Way
REP2-107	Harry St John	Response: In Section 1.10 the questions relating to piles omit potential damage to drains on installation; as is rightly pointed out damage to soil during their removal during restoration in 40 years is bound to occur - compaction and rutting especially in wet conditions by heavy machinery. An agreed restoration specification needs to	As Natural England have identified in their relevant representation, "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.	Agricultural_Land_Use

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		be attached to any DCO as a supplement for the avoidance of doubt and to ensure proper restoration of the land and soil to an equivalent Grade and to enable the cropping of the land to start again. In the same context the management of the topsoil stored on the temporary site compound areas and surplus soil from trenching in miles of cables needs equally careful treatment to minimise damage to the soil and to preserve its current Grade quality	Consequently, Natural England advise that any grant of consent should be made subject to requirements to safeguard soil resources and agricultural land. 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." 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.	
REP2-107	Harry St John	Response: Section /Para 1.15 covers the issue of Working Hours which I have raised previously - might I suggest that this needs discussing at a later hearing - the applicants current proposal on working hours is quite unacceptable	As detailed in the outline CoCP [APP-232 & APP-233] under 1.8 General Requirements, paragraph 1.8.2 - Core working hours for the construction of the Project and secured in the DCO are 07:00 to 19:00 Monday to Saturday.	Construction_period_and_methods
REP2-107	Harry St John	Response: Section/Para 1.16 is the £64.7 million per annum or over the life of the project?	The sum is £64.7m over the operational and maintenance phase of the Project.	Funding_and_PPA
REP2-107	Harry St John	Response: Section/Para 1.17 - have the MOD/Brize Norton and Oxford airports concerns about radar and radio communication interference issues been satisfactorily answered?	The Applicant is not aware of any previous reports of radar and radio communication interference issues relating to solar developments. Thermal turbulence modelling will be conducted for the proposed development. The results of this modelling will be considered in the context of potential radar interference at RAF Brize Norton to determine if any significant impacts are possible.	Aviation
REP2-107	Harry St John	Response: Comments on Blenheim's REP1 ref 098.The summary of Mr D Hare's oral statement at the hearing in May. It is not clear how the £500K pa will be received by the Palace and Park WHS site owned by the Charity - is that the Charity's share of the annual rent from land they own within the solar farm? If not, how will that sum be guaranteed to go to the Charity? He confirmed that in rental terms Blenheim interests will receive in the region of £1000 per acre per annum - so in the order of £3 million plus a year for almost 40 years or £120million or more; in addition the lease terms include indexation to allow for inflation, a performance bonus uplift clause linked to performance of the power station and electricity sold. He also mentioned a reinstatement Bond - one assumes to be held by Blenheim's solicitor's. Perhaps we could be told what this would comprise? He makes no mention of rent review clauses that many commercial leases contain. Can he be asked that? He states there would be public benefit spending the extra income on the WHS Palace and Park - however this is owned by a private charity exempt from tax of any sort and so resulting in no obvious benefit to the public Exchequer; meanwhile the public are charged to access the Park and Palace - if it were free then he might have a point. So it is somewhat disingenuous to suggest there is a public benefit when the ownership rests with the Charity Trustees for the ultimate benefit of the Spencer -Churchill family who enjoy the benefits of the Palace and Park I suspect at no charge.	Subject to the final order limits the project will cover 400 acres of Maintenance Fund land, passing rents to the Heritage Property. This is lower than first expected as some land has been removed as part of the latest change request. The Applicant has provided some information regarding the flow of funds from the leasing of the Blenheim Estate land towards the Maintenance Fund for the upkeep of the World Heritage Site; this is set out in paragraphs 1.5.17 - 1.5.18 of ES Appendix 7.4: Heritage Impact Assessment [APP-141]. Further information has subsequently been provided by Blenheim Palace in their written summary of oral submissions given at the Hearings commencing 12 May 2025 [REP1-098]. The Applicant considers that the identified sum of approximately £500,000 per annum of revenue to the Maintenance Fund represents a significant public benefit.	Community_Benefits_and_Impacts
REP2-110	Joanna Norton	Response: I feel that WODC have articulated my position on the proposed Botley West Solar Farm (BWSF) – that I am not against renewable energy and respect that fact that options need to be looked at for the future of energy in the UK and to tackle climate change. Saying that, the current BWSF is too large, too disparate and does not recognise the importance of 'protecting and enhancing' the local environment and communities. I agree with WODC that a renewable energy scheme, such as BWSF, should be 'proportionate and sympathetic' to the location they would be in – and in the current format BWSF does not do this. In the current format the BWSF proposals will detrimentally impact the area and its historic, built and environmental assets– such as Oxford Green Belt, the historic environment such as Blenheim Palace and the agricultural land. I agree with WODC that there can still be renewable energy benefits with a solar farm project that is reduced in scale to mitigate the harms that the project brings to the area. Overall I support WODC in objecting to the BWSF proposal in its current form and that there would be scope to find a workable size of this project. I support the areas that WODC says should be removed from the project to reduce harms that the solar panels would cause in these areas – and the fact a more data led and nuanced approach should be taken(rather than simply trying to maximise the number of panels).Specifically, for my location (Bladon) I am also aware of 2023 research into a safe distance for solar farms from residential properties: https://gosolarfloridastate.org/blog/what-is-a-safe-distance-to-live-from-a-solar-farm/ The current BWSF proposals do not give enough of a buffer zone for my home and other residents in Bladon and this is of critical importance in getting this project right and not causing undue harm, not least to prevent future liability on BWSF and those that are in charge of approvals. The WODC proposal would move the boundary further away from Bladon – which I fully support	The Applicant notes the comments made by Joanna Norton. There are proposed changes to the separation distance between the Site and the south-eastern edge of Bladon, as referred to in the Change Request Notification submitted at Deadline 2 [REP2-045]. However, it should be emphasised that the basis for this change relates to the setting of the Blenheim World Heritage site, not the residential amenity of properties in Bladon. There will, however, be a beneficial effect on those properties.	Project_description_and_Design_parameters

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
REP2-111	Jonathan Ford	<p>Response: My name is Jonathan Ford. I am motivated by a desire to love the God who loves us all and to love my neighbours, whether local or global. Humankind will only resolve climate change if we choose to love the neighbours we do not know. I speak as a member of the public. I am also a father and environmentalist. Dear Examiners, I understand this document to be primarily a list of the negative impacts of the development as currently designed. It also identifies additional work that is required. It does not intend to address the positive impacts of the development. I understand that you will apply the principle of planning balance when you consider the development. My desire is that the JLIR will result in a better designed development, one which better embraces the requirements of "commodity, firmness and delight" (as described in Gov.uk Guidance: Nationally Significant Infrastructure Projects: Advice on Good Design updated 16th April 2025). My hope is that the development will maximise the benefits it can offer and minimise the negatives. The strap line for my business for the last thirty years has been "... the needs of people ... the laws of nature and of building ... the desire for beauty". Let us aim for this. I draw your attention to my representation made at the Open Floor Hearing on 14th June. In my representation I pointed out that climate change is the issue of our generation. I now draw your attention to the Intergovernmental Panel on Climate Change's AR6 Synthesis Report Climate Change 2023 figure SPM.7 below. Please note – in the top right of the bar chart – how solar is identified as having the most potential to mitigate climate change between now and 2030. It is also proven, quick to deploy at large scale and cheap. How important is climate change mitigation at the scale offered by the development? What does it weigh in the planning balance? Our local councils describe climate change as an emergency. Surely an emergency provides weight in the planning balance. Climate change is the issue of our time..... There is no solution...big, fast and affordable...that can resolve it better than large scale solar. For each reduction in the scale of this development there will be a proportional reduction in the climate change mitigation benefits. I am not suggesting that this means the scale of the development is immutable. However, I am saying that climate change benefit is a very significant benefit not just for what is achieved on this site but because of the impact on other sites both in the UK and around the world. (I refer you to my Open Floor Hearing representation on 14th June 2025.</p>	The Applicant notes, and welcomes, the comments made by Jonathan Ford.	Climate_Change
REP2-111	Jonathan Ford	<p>Response: The second most important issue facing the world is biodiversity. In Table 21 it is suggested that the development has a 'negative' impact on Ecology, Nature Conservation and Trees. This may well be the case if only existing species are considered. However, the planning balance needs to address the benefits. Charity Plant life advise that over 97% of the UK's species-rich grassland has been lost in less than a century and it now covers just 1% of land. As a result, the government is currently paying farmers to put 10% of their arable land to species-rich grassland. My local farmer has put 250 acres into this scheme. It appears contradictory to suggest that a project putting in the order of 1,500 acres of single species arable land to grassland has a negative impact. Blenheim are a good neighbour when it comes to biodiversity. I have seen some of the work that Blenheim have already done and are proposing to do throughout their estate. The work done on adjacent land will benefit ecology and nature conservation within the solar farm as wildlife corridors are formed and both plant and animal species move between the two. Blenheim have planted tens if not hundreds of thousands of trees adjacent to the north site. They plan to plant 300,000 more trees on their estate. Blenheim are proposing to reestablish Combe Marsh. I understand there are plans to increase the biodiversity of the Evenlode Valley in partnership with Evenlode Catchment Partnership. Work has already been done in the Dorn Valley. Blenheim have staff who's sole responsibility is ecology, and the development of the estate's natural capital. High Park is dominated by one of the best collections of veteran oaks in Europe. I recently met one of their staff who was delighted that he had found several fully mature elm trees that appear to be resistant to Dutch elm disease. Blenheim have a track record of caring for Ecology, Nature Conservation and Trees. They are good neighbours.</p>	Comments noted and welcomed by the Applicant.	Local_Ecology_and_Nature
REP2-113	Julie Hutton	<p>Response: I have just been made aware of the cabling routes to the south of Eynsham and am extremely concerned about the safety on the road between Cassington and Eynsham in particular for school children making their way to and from Bartholomew secondary School on foot and cycling.</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 includes assessments of the impact of construction traffic upon road safety and installing cables within roads and concludes that the construction traffic would not create any significant effects upon traffic and transport receptors. In undertaking the assessments, section 12.7 of ES Volume 1, Chapter 12 [APP-049] and Appendix 12.6 Construction Vehicle Trip	Traffic_Transport_and_Access

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			<p>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. The access strategy 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] restricts construction HGVs to only suitable parts of the road network. As part of this access strategy, construction HGVs will not travel through Eynsham or Cassington or past Bartholomew Secondary School and there will be no cable works within Eynsham or Cassington or past Bartholomew Secondary School 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 Requirement 11 of the Development Consent Order [REP2-004].Section 1.8 of the OCTMP [APP-232] sets out that traffic management (including for cable laying) will be in accordance with The Traffic Signs Manual, Chapter 8, Part 1, Traffic Safety Measures and Signs for Road Works and Temporary Situations (Department for Transport/Highways Agency (now National Highways) et al., 2009). The key function of those measures is to maintain safety for all road users, including pedestrians and cyclists. Section 12.10 of ES Volume 1, Chapter 12 [APP-049] includes assessments of the impact of construction upon road safety and installing cables within roads and concludes that the construction would not create any significant effects upon road safety.</p>	
REP2-113	Julie Hutton	<p>Response: I would like confirmed the route of any additional traffic relating to the installation, maintenance and decommissioning of the solar project, in particular HGVs and what mitigating arrangements will be made such as pedestrian crossings. [Please see attached]</p>	<p>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. The access strategy 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] restricts construction HGVs to only suitable parts of the road network. 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 [REP2-004].Section 1.8 of the OCTMP [APP-232] sets out that traffic management (including for cable laying) will be in accordance with The Traffic Signs Manual, Chapter 8, Part 1, Traffic Safety Measures and Signs for Road Works and Temporary Situations (Department for Transport/Highways Agency (now National Highways) et al., 2009). The key function of those measures is to maintain safety for all road users, including pedestrians and those measures to be adopted will provide for pedestrians to maintain their safety during the construction works and when those traffic management measures are required. Section 12.4 of ES Volume 1, Chapter 12 [APP-049] sets out that when the Project is operational it does not require any manned facilities and requires only infrequent maintenance activities that will be undertaken by a light vehicle (typically a 4x4) daily / weekly. It sets out that the potential impact of additional vehicle movements on traffic and transport receptors during operation and maintenance of the Project is unlikely to result in significant effects. An Outline Decommissioning Plan [APP-236] has been submitted in support of the application for development consent from which a Decommissioning Plan will be prepared as secured in Requirement 14 of the Development Consent Order [REP2-004].</p>	Traffic_Transport_and_Access
REP2-114	Kathryn Thomson	<p>Response: [Video submission]</p>	<p>Noted and responses have been covered in the responses to REP2-115 below.</p>	Landscape_and_Visual_Impacts
REP2-115	Kathryn Thomson	<p>Response: I was told at a consultation that “You won’t see them” when referring to the panels which is both counterintuitive and disingenuous since the land behind us rises 140 feet so panels would clearly be seen from our property and blight our aspect, markedly spoiling the amenity. Any hedge would need to be many metres high. We have public rights of way regularly enjoyed by many villagers who, if the panels were to be approved, would have their walks eventually hemmed in by nine feet high chain link fences resembling a prison exercise yard and be exposed to an industrial landscape on currently green belt land. Looking down from Purwell Farm would no longer be an enjoyable vista of Oxfordshire countryside with a village nestling below.</p>	<p>Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan [APP-062] and the Landscape, Ecology and Amenities Plan [APP-228]. All existing public rights of way would be retained on their current routes. A minimum 5 m width would be given to the footpaths, with hedgerows planted to either side and trees where space allows avoiding overshadowing of the panels. The hedgerows would be managed to an appropriate height (3m to 4m) which over time would help to screen available views of the panels. It is acknowledged that some available views of the panels would remain, even once mitigation has matured. Public rights of way flanked by hedgerows and / or trees are characteristic elements in the existing landscape. With some, such as 416/11/20 (Claude Duvall Way) passing through a narrow and in places, green lane. The Project mitigation, detailed above, would allow for a more generous corridor, 5 m minimum, within which the public rights of way would pass, in the majority of cases. Creating a wide green corridor is also characteristic of the existing landscape, such as much of Dornford Lane (PRoW 416/11/30) which oases through the middle f the northern section of the Project. Proposed mitigation would be retained, post decommissioning, as part of the landscape legacy of the Project and enhance the overall landscape structure of the local areas, improving connectivity between habitats. It is acknowledged that this would result in a change in views available within the landscape. However, with the undulating nature of topography and suitable widths for PRoW corridors, it is anticipated that views to the wider landscape and key features such</p>	Landscape_and_Visual_Impacts

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
			as church spires would remain visible and available to users. The retention of proposed mitigation, designed in as part of the Project, would enhance the key characteristics of host landscape character areas and be in line with recommended guidelines and enhancements priorities. For example, LCA 4: Estate Parks and Farmlands, which covers much of the northern section of the Project, has the following priorities which the Project is taking account of and reinforcing: retain mature boundary and roadside trees and replant as necessary; manage and extend existing areas of woodland to maximise their wildlife and landscape value; plant new blocks and belts of broadleaved woodland within estate farmland to reinforce typically enclosed, well-wooded character. (Page 35, West Oxfordshire Landscape Assessment 1998) Within the LVIA, the mitigation proposed as part of the Project would not alter the baseline view(s) as the planting would form part of a future baseline scenario. Planting that would alter the baseline views, particularly at Year 15, but also forms part of a baseline scenario are large areas of woodland planting being undertaken and in some cases planting within parts of the Blenheim Estate, in proximity to the Project. Areas of new woodland are shown on the Illustrative Masterplan [APP-062] and can be seen in many of the baseline views, such as Representative Viewpoint 10 [APP-065 and 066]. Where visible, the new woodland has been factored into the LVIA assessment of effects and it has been assumed that, like the proposed mitigation, this woodland would be established at summer Year 15 and so further minimise potential effects.	
REP2-115	Kathryn Thomson	Response: Cassington is a village which already regularly suffers flooding so armouring the surrounding fields with metal and glass would necessarily increase the water run off towards the village on land some of which has already been denuded of a gravel layer which went into the building of the A40. How can a commercial proposal to increase flooding be justified?	The Applicant's comments in regard to this point were previously provided at Deadline 1, under reference [REP1-155]	Hydrology_and_Flood_risk
REP2-115	Kathryn Thomson	Response: We have been told that the land proposed for the panels is largely low agricultural standard and not good for growing crops. I think perhaps the crops currently growing healthily next to us call the lie to that at a time when imported food supply is threatened and home grown food even more important.	No further comment required.	Agricultural_Land_Use
REP2-115	Kathryn Thomson	Response: When we first came to Cassington, it was a quiet village with little traffic. Since the advent of the Cassington traffic lights and satnav, we have become a rat run for cars, vans and lorries, the latter paying no attention to the 7.5 ton weight limit. How much worse would this be if construction started and many more huge lorries would be driving through the village all day and every day? The noise and disruption would be intolerable, not to mention the havoc caused to the road surfaces. We don't have a pedestrian crossing near the village school of St Peter's and our children's safety would therefore be further jeopardised.	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. The access strategy 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] restricts construction HGVs to only suitable parts of the road network. As part of this access strategy, construction vehicles will not travel through Cassington. Because there would be no construction vehicles travelling through Cassington, there is no need for any mitigation within Cassington, including for pedestrians and road surfaces, and there would be no significant effects arising for any transport receptors within Cassington. This access strategy is set out as a measure within the Outline Construction Traffic Management Plan (OCTMP) which forms Annex A of the Outline Code of Construction Practice Part 1 [APP-232] and is secured at Schedule 13 of the Development Consent Order [REP2-004].	Traffic_Transport_and_Access
REP2-116	Kathryn Thomson	Email [summary of video provided at REP2-114] Response: The video is filmed from our land and shows one of the fields around Cassington on which solar panels are proposed and highlights the potential severity of the visual impact as the land rises behind us. Please see my previous email. It also shows the increased potential water run off if the land was covered by panels.	Noted.	Landscape_and_Visual_Impacts
REP2-135	Samuel Pegg	Response: I support the West Oxfordshire District Council (WODC) Written Representation and the Joint Local Impact Report (by the Oxfordshire Host Authorities). I feel that WODC have articulated my position on the proposed Botley West Solar Farm (BWSF) – that I am not against renewable energy and respect that fact that options need to be looked at for the future of energy in the UK and to tackle climate change. Saying that, the current BWSF is too large, too disparate and does not recognise the importance of 'protecting and enhancing' the local environment and communities. I agree with WODC that a renewable energy scheme, such as BWSF, should be 'proportionate and sympathetic' to the location they would be in – and in the current format BWSF does not do this. In the current format the BWSF proposals will detrimentally impact the area and its historic, built and environmental assets– such as Oxford Green Belt, the historic environment such as Blenheim Palace and the agricultural land. I agree with WODC that there can still be renewable energy benefits with a solar farm project that is reduced in scale to mitigate the harms that the project brings to the area. Overall I support WODC in objecting to the BWSF proposal in its current form and that there would be scope to find workable size of this project. I support the areas that WODC says	The Applicant notes the comments made by Mr Pegg. There are proposed changes to the separation distance between the Project installation areas and the south-eastern edge of Bladon, as referred to in the Change Request Notification submitted at Deadline 2 [REP2-045]. However, it should be emphasised that the basis for this change relates to the setting of the Blenheim World Heritage site, not the residential amenity of properties in Bladon. There will, however, be a beneficial effect on those properties.	Project_description_and_Design_parameters

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		should be removed from the project to reduce harms that the solar panels would cause in these areas – and the fact a more data led and nuanced approach should be taken (rather than simply trying to maximise the number of panels). Specifically, for my location (Bladon) I am also aware of 2023 research into a safe distance for solar farms from residential properties: https://gosolarfloridastate.org/blog/what-is-a-safe-distance-to-live-from-a-solar-farm/ The current BWSF proposals do not give enough of a buffer zone for my home and other residents in Bladon and this is of critical importance in getting this project right and not causing undue harm, not least to prevent future liability on BWSF and those that are in charge of approvals. The WODC proposal would move the boundary further away from Bladon – which I fully support.		
REP2-137	Terence Kenneth Castle	Response: Submission ID: 36785 Fully agree with WODC analysis in reducing the size of Botley West Solar Farm	The Applicant notes Mr Castle's comments, and highlights the proposed Change Requestion Notification that was submitted at Deadline 2 [REP2-045]	Project_description_and_Design_parameters
REP2-138	Tim Sumner	Response: Following my presentation at The Inspector's 3 day hearing regarding the ownership of The Blenheim Estate in which I made the case that the Blenheim Estate was founded on Crown Land which, to this day, is leased from The Crown Estate on receipt of one flag per annum, I wish to emphasise that The Crown Estate leased land is not just the parkland around the Palace but extends to Manors and Villages all around the Palace as referenced in the original Queen Anne Act of 1705. Furthermore, at the base of the Column erected within Blenheim Grounds and featuring the First Duke, there is inscribed the Queen Anne Act with the names of the Manors and Villages which are leased to The Duke. It is, therefore, literally set in stone. This is contrary to assertions by the Developer who claims the protected land is just the parkland where no solar panels will be placed.	The Applicant's position on Crown Land has not changed, and refers to the paragraph 1.3.8 to 1.3.10 of the Applicant's Written Summary of Oral Submissions at the Open Floor Hearings (OFH1 & OFH2) [REP1-018] . In addition to the Applicant's position on Crown land in accordance with the Planning Act 2008, Blenheim has provided the Applicant with a report, prepared by Withers LLP, following the Open Floor Hearing in May 2025, titled 'Botley West Solar Farm Blenheim Estate Ownership Commentary'. Amongst other things, this report states that the Blenheim Parties are not aware of any claim by any mortgagee that there is any such mortgage affecting the Option Land and that there is no such mortgage registered against the title of the Option Land (see paragraph 3.2) a copy of this report has been submitted at this Deadline, [reference EN010147/APP/13.6] .	Land_Agreements
REP2-138	Tim Sumner	Response: Furthermore, the Developer states in their Environmental Statement. Pins Ref: EN 010147/App/6.2 : 6.2.4 The Blenheim Palace World Heritage Site (WHS) is located just to the west of the Project Site. The boundary of the WHS is almost contiguous with the boundary of the Blenheim Palace Grade I Registered Park and Garden whilst this defined historic landscape also contains numerous listed buildings including the palace, the water terrace gardens and Bernini fountain, the Grand Bridge and the New Bridge (all listed as Grade I). (my bold highlight) This definition of the boundary of the WHS is wrong. The 2017 Blenheim Palace World Heritage Site Revised Management Plan' for UNESCO clearly states: "The extent of setting is not fixedit does not have a fixed boundary and cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset.....much of the setting lies within the wider extent of the Blenheim estate..... Thus for almost 300 years, management of the wider estate has acted as a means of both supporting the historic core and protecting it." It continues " The manager / s (of a World Heritage site) aim must be the continuing sustainable use of the landscape, whether urban or rural, while keeping what is important from the past, As a consequence, management must also change to accommodate the views of others and the interests of those who live and work in an area." (My bold highlights	The boundary of the WHS is fixed and was established at the time that the WHS was inscribed on the World Heritage List in 1987. It is indicated clearly on Figure 1.1 of ES Appendix 7.4: Heritage Impact Assessment – Blenheim Palace World Heritage Site [APP-141] . The setting of the WHS is not fixed – in accordance with national planning guidance the setting of a heritage asset is defined as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve' (NPPF Glossary). The definition establishes that the setting is not fixed in terms of geographic extent.	Historic_Environment
REP2-138	Tim Sumner	Response: I further ask that you investigate the terms of the 1,000 year mortgage that Parliament holds on The Blenheim Estate through The Blenheim Estate Act of 1856. It is, I suggest, unlikely that any Mortgage holder allows for the leasing of land to the property which would mean that should the Mortgage be called in the Mortgagee would be unable to return areas of leased land to the Mortgage Holder. All details are contained in my previous submissions to you.	Please see response provided to Mr Sumner above in regard to mortgagees – including reference to the report by Withers LLP [EN010147/APP/13.6] .	Land_Agreements
REP2-120	Michael Brown	Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including: <ul style="list-style-type: none"> a widespread degree of frustration caused by the Applicant's failure to engage properly; 	Counter Context The Applicant acknowledges this comment but confirms that the level of consultation undertaken, and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in the Consultation Report [APP-024] and confirmed in the Acceptance checklist (s55) [PD-001] and Notification of Decision to Accept Application [PD-002] , which was submitted to the Planning Inspectorate and accepted for examination. 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] .	Consultation_Process
REP2-120	Michael Brown	Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including:	Noted.	Acknowledgment

Examination Library Ref.	Name	Comment	Applicant's Response	Issues
		<ul style="list-style-type: none"> the proposed new mitigation hedging being a mixed blessing; 		
REP2-120	Michael Brown	<p>Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including:</p> <ul style="list-style-type: none"> the need for more visualisations/photomontages; the downplaying by the Applicant of the assessment of impact on landscape and heritage assets in particular; 	The 55 Representative Viewpoints, used within the submitted Landscape and Visual Impact Assessment (LVIA) [PDB-006] , were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Impact Assessment [PDB-006]). The number of selected viewpoints and their locations is considered proportionate to the Project. Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080] . These were considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149] . It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [PDB-006] . It should also be clarified that although the assessment of landscape and visual effects is supported by the 55 Representative Viewpoints alongside the 33 visualisations (photomontages), the assessment conclusions are not based only on the viewpoints themselves. A review of the magnitude of impact and significance of effect from agreed Representative Viewpoints, identified in the submitted LVIA [PDB-006] , is being carried out as part of the submission for Deadline 3. This will provide further clarification as to the effects identified and / or any changes required as a result of the review.	Landscape_and_Visual_Impacts
REP2-120	Michael Brown	<p>Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including:</p> <ul style="list-style-type: none"> the failure of the Applicant to recognise its own evidence about the extent of Grades 2 and 3A BMV land; 	The Applicant notes this comment. No further response is required.	Agricultural_Land_Use
REP2-120	Michael Brown	<p>Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including:</p> <ul style="list-style-type: none"> the need to provide much larger buffers both for residences and PRoW; 	Noted.	Public_Right_of_Way
REP2-120	Michael Brown	<p>Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including:</p> <ul style="list-style-type: none"> the Applicant's weak Green Belt submission; 	The Applicant has provided further detailed comments in relation to the assessment of alternatives and the approach to Green Belt within its response to the ExAQs at Deadline 2 [REP2-025]	Green_Belt
REP2-120	Michael Brown	<p>Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including:</p> <ul style="list-style-type: none"> the need for much greater importance to be given to the wider setting of the WHS and the settings of numerous Grades 1 and 2 properties as well as conservation villages; the disingenuousness of denying the fundamental destruction of the historic landscape character. 	<p>A detailed assessment of the likely impacts and effects arising from changes within the settings of heritage assets is presented in ES Appendix 7.5: Settings Assessment [APP-142], a Revision 1 version of this document, with additional information, was submitted at Deadline 2 [REP2-015].</p> <p>An assessment of the likely impacts and effects on the character of the historic landscape is presented in Section 7.9 of ES Chapter 7: Historic Landscape [CR1-003].</p>	Historic_Environment
REP2-120	Michael Brown	<p>Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including:</p> <ul style="list-style-type: none"> The cumulative effect and impact of the sheer vastness of the proposal on all those living within, walking along its PRoW, or travelling through the 3,400 acre industrialised site. 	The Applicant notes Mr Brown's comment.	Cumulative_Impacts
REP2-120	Michael Brown	<p>Response: Comments on Written Representations There is much consistency in the views being expressed in the WRs, including:</p> <ul style="list-style-type: none"> There is also rightly a general recognition that renewable energy generation in general and solar power in particular has a very important part to play in future whilst at the same time also a recognition that there must be a limit to the amount and type of destruction that can be justified in the process. 	The Applicant notes Mr Brown's comment.	Acknowledgment
REP2-120	Michael Brown	<p>Response: The WODC Written Representation is a tour-de-force of common sense supported by properly researched evidence. Many of the same points are also well expressed in WRs by, for example ICOMOS, CPRE and Marrons on behalf of Stop Botley West. And much of it is brought together in the powerful WR by Stop Botley West's 'Heritage Alert'. My underlying comments therefore are to first to thank the ExA members for their very considerable attention to the detail of this matter, not least shown by their extensive First Written Questions, and second to ask them not only to give weight to the expert and professional views expressed in the WRs but also to continue their forensic work so they can provide strong advice to the Secretary of State that the proposal as submitted in the draft DCO Application should at least be much curtailed.</p>	The Applicant notes Mr Brown's comment. The Planning Supporting Statement demonstrates how the Project complies with relevant legislation and policy, including the urgent need for low carbon energy generation highlighted in legislation and policy such as the Climate Change Act 2008 [APP-225] .	Acknowledgment