



Botley West Solar Farm

STATEMENT OF COMMON GROUND –

Vale of White Horse District Council

EN010147/APP/11.7/12

22 July 2025

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Statement of
Common Ground -
Vale of White Horse
District Council
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Approval for issue

Jon Alsop

22 July 2025

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SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and Vale of White Horse District Council.

Vale of White Horse District Council

[Signature]

[Name]

[Title]

[Organisation]

[Date]

SolarFive Ltd

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[Name]

[Title]

[Organisation]

[Date]

1 Introduction

1.1 DCO Reference

1.1.1 EN010147/APP/11.7/12

1.2 Date of Examination

1.2.1 May 2025 – November 2025

1.3 Proposed Development

1.3.1 The Applicant is seeking development consent for Botley West Solar Farm (the 'Project'), which in summary will comprise the construction, operation, maintenance and decommissioning of a photovoltaic ('PV') solar farm and associated infrastructure with a total capacity exceeding 50 megawatts ('MW'), in parts of west Oxfordshire, Cherwell and Vale of White Horse districts. The Project will export electricity for connection to the National Grid at Botley West.

1.3.2 The Project is classed as a 'nationally significant infrastructure project' ('NSIP') for the purposes of the Planning Act 2008 (PA 2008) and requires an application for a Development Consent Order (DCO). The application for development consent is being submitted to the planning inspectorate ('PINS'), with the decision on whether to grant a DCO to be made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), as required under the PA 2008.

1.3.3 This Statement of Common Ground (SoCG) has been prepared to support the DCO application made to the Secretary of State under section 37 of the PA 2008 for the proposed Project. The Application has been submitted by SolarFive Ltd (the Applicant).

1.3.4 A Location Plan can be found in the Examination Library at **[AS-024]** and a full description of the Project can be found at ES Chapter 6 - Project Description **[APP-043]**.

1.4 Statement Overview

1.4.1 This Statement of Common Ground ('SoCG') is a working draft document. It comprises a record of consultation held with the relevant SoCG organisation to date as appropriate, and is designed to evolve, representing the ongoing nature of these discussions throughout the Examination period.

1.4.2 This SoCG has been prepared between (1) the Applicant and (2) Vale of White Horse District Council (jointly referred to as the Parties).

1.4.3 An overarching Statement of Commonality **[EN01047/APP/11.6]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.

1.4.4 The Examining Authority has requested that the SoCGs include the following matters as set out in the Rule 6 Letter **[PD-006]**:

- Methodology for environmental assessments;

- Data collection methods;
- Baseline data;
- Data/statistical analysis, approach to modelling and presentation of results;
- Expert judgements, assumptions and worst case scenario;
- Assessment of alternatives;
- Design development;
- Identification and sensitivity of relevant features and receptors;
- Construction and operational effects;
- Embedded and additional mitigation;
- Cumulative effects and mitigation; and
- Relevant wording in the draft Development Consent Order (dDCO)

1.4.5 It can be taken that any matters not specifically referred to in sections 3 and 4 of this SoCG are not of material interest or relevance to Vale of White Horse District Council's representations and therefore have not been considered in this document.

1.4.6 For the avoidance of doubt, this SoCG comprises contributions from the following environmental topic disciplines:

- Ecology
- Historic Environment
- Agricultural Land Use & Public Rights of Way
- Landscape and Visual Resources
- Noise and Vibration
- Planning Policy

1.4.7 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with Vale of White Horse District Council to date:

- a. Relevant submission documents and plans
- b. Record of relevant correspondence to date
- c. Matters that are agreed
- d. Matters yet to be agreed
- e. Matters that are not agreed

1.4.8 As referenced above, c, d, and e (sections 4), summarises issues that are 'agreed', 'yet to be agreed' or are 'not agreed'. 'Not agreed' indicates a final position where the parties have agreed to disagree. 'Agreed' indicates that an issue has been resolved.

2 Relevant Submissions Documents and Plans

2.1.1 A list of DCO documents and plans of relevance to engagement with Vale of White Horse District Council is identified in the tables below for ease of reference.

Table 2.1: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Ecology and Nature Conservation

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/2.2	Streets, Access and Rights of Way Plans	APP-005	November 2024
EN010147/APP/2.6	Statutory and Non-Statutory Sites - Features of Nature Conservation Plan	APP-009	November 2024
EN010147/APP/2.8	Habitats of Protected Species Plan	APP-010	November 2024
EN010147/APP/2.9	Statutory and Non-Statutory Features of Historic Environment Plan	APP-012	November 2024
EN010147/APP/2.10	Hedgerow Removal Plans	APP-013	November 2024
EN010147/APP/3.1	Draft Development Consent Order	REP2-004	Rev3/ July 2025
EN010147/APP/6.2	ES Volume 0, Non-Technical Summary	APP-037	P0/ November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 9 Ecology and Nature Conservation	REP2-012	Rev2/ July 2025
EN010147/APP/6.4	ES Volume 2, Figure 9.1 Statutory Designated Sites	APP-086	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.2 Non-Statutory Designated Sites	APP-087	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.3 a b & c Phase 1 Habitat Map	APP-088	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.1 Desk Study	APP-150	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.2 Phase 1 Habitat Survey Report	APP-151	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.3 Hedgerow Survey Report	APP-152	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.4 Bat Survey Report	APP-153	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.5 Great Crested Newt (GCN) Survey Report	APP-154	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.6 Invertebrate Survey Report	APP-155	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.7 Reptile Survey Report	APP-156	P0/ November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 9.8 Badger Survey Report [CONFIDENTIAL]	APP-157	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.9 Breeding Bird Survey Report	APP-158	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.10 Wintering Bird Survey Report	APP-159	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.11 Dormouse Survey Report	APP-160	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.12 Arable Weeds Survey Report	APP-161	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.13 Biodiversity Net Gain Assessment	APP-162	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.14 Habitats Regulations Assessment Report	APP-163	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.15 Veterans Tree Survey Report	APP-164	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.16 Section 42 Consultation Responses	APP-165	P0/ November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	APP-228	November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 1	APP-232	P0/ November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 2	APP-233	P0/ November 2024
EN010147/APP/7.6.2	Outline Operational Management Plan	REP2-017	Rev2/ July 2025
EN010147/APP/7.6.3	Outline Landscape and Ecology Management Plan	REP2-019	Rev2/ July 2025
EN010147/APP/7.6.4	Outline Decommissioning Plan	APP-236	P0/ November 2024

Table 2.2: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Historic Environment

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 7: Historic Environment	CR1-003	Rev 1/March 2025
EN010147/APP/6.5	ES Volume 3, Appendix 7.1: Historic environment desk-based assessment	APP-131	November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology	APP-132	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.3: Geophysical survey report, Parts 1-8	APP-133 – APP-140	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment	APP-141	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.5: Settings Assessment	REP2-014	Rev 1/July 2025
EN010147/APP/6.5	ES Figures 2.1a – 2.4c – Illustrative Masterplan	AS-020	Rev 1/March 2025
EN010147/APP/6.5	ES Figures 8.248 - 8.371 - Photomontages (Winter and Summer)	APP-072 – APP-080	November 2024
EN010147/APP/7.6.5	Outline Written Scheme of Investigation	REP2-021	Rev 2/July 2025
EN010147/APP/12.7	Additional Photomontages for Historic Environment Assessment	REP2-030 – REP2-033	July 2025

Table 2.3: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Agricultural Land Use and ProW

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev01/November 2024
EN010147/APP/6.3	ES Chapter 17 - Agricultural Land Use and Public Rights of Way	APP-054	Rev01/November 2024
EN010147/APP/6.4	ES - Figures 17.1 to 17.6	APP-108 to APP-113	Rev01/November 2024
EN010147/APP/6.5	ES - Appendix 17.1 ALC and Soil Survey Report	APP-223	Rev01/November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	APP-232	Rev01/November 2024
EN010147/APP/7.6.2	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	APP-233	Rev01/November 2024

Table 2.4: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Landscape and Visual Resources

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev01/November 2024
EN010147/APP/6.3	6.3 - ES Chapter 8 – Landscape and Visual Impact Assessment	APP-045	Rev01/November 2024
EN010147/APP/6.4	Figure 8.128 to 8.243: Representative Viewpoint Photographs (Summer)	APP-065	Rev01/November 2024
EN010147/APP/6.4	Figure 8.12 to 8.127: Representative Viewpoint Photographs (Winter)	APP-066	Rev01/November 2024
EN010147/APP/6.4	Figure 8.1-8.3 Site Location	APP-067	Rev01/November 2024
EN010147/APP/6.4	Figure 8.244: National Character Areas	APP-068	Rev01/November 2024
EN010147/APP/6.4	Figure 8.245: Regional Landscape Character	APP-069	Rev01/November 2024
EN010147/APP/6.4	Figure 8.246: Local Landscape Character Areas	APP-070	Rev01/November 2024
EN010147/APP/6.4	Figure 8.247: District Landscape Character Areas (including ZTV)	APP-071	Rev01/November 2024
EN010147/APP/6.4	Figure 8.248 to 8.371: Photomontages (Winter and Summer)	APP-072 to APP-080	Rev01/November 2024
EN010147/APP/6.4	Figure 8.4-8.6: Landscape Resources Plan	APP-081	Rev01/November 2024
EN010147/APP/6.4	Figure 8.7: ZTV and Representative Viewpoints (Whole Project Overview)	APP-082	Rev01/November 2024
EN010147/APP/6.4	Figure 8.8: ZTV Section Overlaps (Whole Project Overview)	APP-083	Rev01/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.4	Figure 8.8a: ZTV Bare Earth	APP-084	Rev01/November 2024
EN010147/APP/6.4	Figure 8.9-8.11: Representative Viewpoint and Photomontage Locations	APP-085	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.1: Landscape Character	APP-143	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.2: Landscape Value	APP-144	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.3: Strategic Arboricultural Impact Assessment & Method Statement	APP-145 to APP148	Rev01/November 2024
EN010147/APP/6.5	Appendix 8.4: Photomontage Methodology	APP-149	Rev01/November 2024
EN010147/APP/6.3	Figure 2.1a to 2.4d: Illustrative Masterplan	APP-062	Rev01/November 2024
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	REP2-016	Rev2/ July 2025
EN010147/APP/7.6.3	Outline Landscape and Ecological Management Plan	REP2-019	Rev2/ July 2025

Table 2.5: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Noise and Vibration

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.3	6.3 - ES Chapter 13 - Noise and Vibration	PDB-010	Rev01May 2025
EN010147/APP/6.4	6.4 ES - Figure 13.1 - Construction Phase Noise Study Area	APP-103	Rev01/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.2 - Construction Phase Vibration Study Area	APP-104	Rev01/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.3 - Operational Phase Noise Study Area	APP-105	Rev01/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	6.5 ES - Appendix 13.1 Baseline Sound Survey	APP-211	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.2 Construction Phase Noise and Vibration	APP-212	Rev01/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.3 Operational Phase Noise	APP-213	Rev01/November 2024
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 1	APP-232	Rev01/November 2024
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 2	APP-234	Rev01/October 2024
EN010147/APP/7.6.2	7.6.2 - Outline Operational Management Plan	REP2-017	Rev01/July 2025

Table 2.6: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Planning Policy

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/7.1	7.1 Planning Supporting Statement inc. Green Belt Case	REP1-012	Rev1/ June 2025

3 Record of Relevant Correspondence

- 3.1.1 The Project has been the subject of pre-application engagement with Vale of White Horse District Council, and both parties continue to engage throughout and beyond the submission of the DCO application for the Project.
- 3.1.2 **Appendix A** identifies the discussions and correspondence that have taken place between the Applicant's project team and Vale of White Horse District Council to date.

4 Areas of Discussion between the Parties

Table 4.1: Areas of Discussion between the Parties – Ecology and Nature Conservation

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
4.1.1	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	Survey methodology	Other than where noted below, survey scope and methodology agreed.	Agreed.	Agreed.
4.1.2	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	Assessment approach, scope and methodology	Other than where noted below, assessment approach, scope and methodology agreed.	Agreed.	Agreed.
4.1.3	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	Impacts to Ancient Woodland	Adverse impacts on Ancient Woodland are unacceptable unless there are wholly exceptional reasons, and a suitable compensation strategy exists. PH are identified under s41 of the NERC Act 2006 as being of principle importance for the purpose of conserving and enhancing biodiversity. Adverse impacts should be avoided wherever possible, and opportunities to enhance them taken.	The Project has been designed to avoid areas of ancient woodland such that none occur within the order limits. Measures would be put in place to ensure that a minimum 15 metre buffer is retained between ancient woodland and construction areas. Appropriate fencing in accordance with BS 5837, would be erected around the 15 metre buffer to prevent access by people, materials or machinery to avoid compaction of soils or roots and to avoid any accidental damage, as per Natural England guidance.	Discussions ongoing.
4.1.4	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP2-012]	License applications	The development will have impacts on protected and priority species. Where development activities require a derogation licence from Natural England to proceed lawfully, the Secretary of State should be satisfied that such a licence is likely to be granted when considering any relevant tests of derogation.	Draft license applications will be submitted to Natural England for relevant species, in order to receive Letters of No Impediment (LONI).	Discussions ongoing.
4.1.5	7.6.3 Outline Landscape and Ecology Management Plan (Rev 1) [REP2-019]	Skylark mitigation	Measures intended to avoid, mitigate, and compensate for impacted species should be likely to succeed and be robustly secured. VWHDC remains concerned that the proposed approach to skylark compensation, through the provision of interspersed skylark plots, is unlikely to be successful. Skylarks are an open-ground nesting species with strong anti-predator behavioural tendencies which mean that they are unlikely to utilise plots in proximity to structures, trees or boundaries. The placement of skylark plots within array complexes (close to individual panels) means that those plots are unlikely to be used for breeding.	The plots are not intended to be used as mitigation for breeding skylark territories per se. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity of species that might nest either within the archaeological areas which are spread throughout the Project site and which will be managed specifically for birds (both wintering and breeding) or in fields near to the Project site. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species.	Discussions ongoing.
4.1.6	6.5 ES - Appendix 9.13 Biodiversity Net Gain Assessment [APP-162]	Biodiversity Net Gain	NSIPs are not currently subject to mandatory BNG. However, a net positive biodiversity outcome should be targeted. Solar schemes generally tend to offer the ability to provide BNG onsite, where the original habitat is of low value. In this case, the transition from arable land to grassland underneath solar panel arrays is likely to lead to a gain. However, due to the impacts of arrays on availability of light, rainfall, humidity and management, it is recommended that a	The calculation of the project's Biodiversity Net Gain (BNG) is set out in the Biodiversity Net Gain Assessment, provided in Volume 3, Appendix 9.13 [APP-162] . BNG for Nationally Significant Infrastructure Projects is expected to become a requirement from late November 2025, expected to be set at 10% BNG.	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
			<p>precautionary approach is taken when considering the value of grasslands that can be created and maintained as part of the proposals.</p> <p>The Secretary of State should be content that a thorough and evidenced BNG assessment has been completed and that the establishment and ongoing maintenance of habitats is secured robustly. Should VWHDC be required to take on monitoring or enforcement functions, suitable financial contributions should be secured to ensure that this is possible.</p>	The outline maintenance and monitoring of BNG landscape elements of the site is set out in the Outline Landscape and Ecology Management Plan (OLEMP) [APP-235]. The OLEMP is part of the project's embedded mitigation and will be secured in the Development Control Order (DCO) [REP2-004].	

Table 4.2: Areas of Discussion between the Parties – Historic Environment

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
4.2.1	ES Chapter 7: Historic environment [CR1-003]	Assessment approach, scope and methodology.	Other than where noted below, assessment approach, scope and methodology agreed.	Other than where noted below, assessment approach, scope and methodology agreed.	Agreed.
4.2.2	ES Appendix 7.3: Geophysical Survey Report [APP-133 – APP-140]	Methodology for geophysical surveys.	The application of the geophysical survey methodology within the Project Site is acceptable.	The application of the geophysical survey methodology within the Project Site is acceptable.	Agreed.
4.2.3	ES Chapter 7: Historic environment [CR1-003]	Mitigation of potential impacts on buried archaeological remains.	The proposed methodologies for the mitigation of potential impacts on buried archaeological remains are acceptable.	The proposed methodologies for the mitigation of potential impacts on buried archaeological remains are acceptable.	Agreed.
4.2.4	Outline Written Scheme of Investigation (Rev 2) [REP2-021]	The proposed programme of further archaeological work.	The proposed programme of further archaeological work is acceptable.	The proposed programme of further archaeological work is acceptable.	Agreed.
4.2.5	ES Chapter 7: Historic environment [CR1-003]	The level of harm to the significance of designated heritage assets.	All harm to the significance of designated heritage assets is less than substantial, therefore the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1.	All harm to the significance of designated heritage assets is less than substantial, therefore the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1.	Agreed
4.2.6	ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]	The likely impact and effect on the Cumnor Village Conservation Area as a result of change within its setting.	<p>Of particular concern is the lack of assessment of the relationship of Cumnor Village Conservation Area to its surroundings and whether the existing context contributes to our understanding of its significance or not. Whilst the Neighbourhood Plan assessment has been referred to, no reference is made to the Cumnor Conservation Area Appraisal (Jan 2011) or the way it is described in its landscape context within this document.</p> <p>Having reviewed the LVIA photomontages of the proposed arrays (Viewpoints 42-55 where modelled in Figures 8.248 to 8.371 Parts 8 & 9 of 9) on the slopes below Cumnor Village it is clear that the manner in which the approach to Cumnor village from the north is currently experienced will fundamentally alter both from the B4017 Cumnor Road and the Public Rights Of Way that cross the landscape to the north of the village. Whilst it is accepted that the conservation area will not be directly impacted by the proposal, the open agricultural and rural approach to the village will be significantly changed as a result and this has not been assessed within the submitted ES. Scoping reasons provided as purely on whether the site can be seen from the Conservation Area and not in how it is experienced in its current context, is not a robust or consistent way of assessing the contribution made by the setting of assets in accordance with good practice guidance. The transformation of the character of this area from rolling countryside to a semi-industrial landscape will impact the way the Cumnor Conservation Area is understood and experienced from its wider setting, eroding the sense of the settlement as a small hill-top</p>	<p>The Cumnor Conservation Area was scoped out of the detailed assessment presented in ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014] on the basis that the Project Site does not form any part of the setting of the Conservation Area. The location of the Conservation Area in relation to the proposed development is indicated on Figure 3c in ES Appendix 7.1: Historic environment desk-based assessment [APP-131] and is described in paragraphs 1.5.50 – 1.5.52 of that document. Reference is made here to the 2011 Cumnor Conservation Area Appraisal, contra the assertion that this document has not been reviewed.</p> <p>The Conservation Area is focused on the historic village core but also spreads out along the main roads as a result of a dispersed pattern of historic farms being located on these routes. The key contributions towards the heritage significance of the Conservation Area come from the historic buildings within the village core, the relationships between these buildings and the spaces which divide and enclose them. The wider rural setting of the Conservation Area makes some contribution towards its heritage significance. Map 4 in the 2011 Cumnor Conservation Area Appraisal shows the location and direction of 'Important Views' into and out of the Conservation Area. There are no identified 'Important Views' towards the proposed development, and indeed no part of the proposed development would be visible in views out of the Conservation Area.</p>	Discussions remain ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
			<p>village set in open countryside on the edge of the more sub-urban area of Oxford City.</p> <p>VWHDC considers the area forms an important rural transition between countryside and city and the proposals will erode this along with the contribution it makes to the significance of the designated historic village conservation area. Whilst it could be a low level of impact, not more than Negligible Adverse, it is an adverse impact that should have been more thoroughly examined within the ES Heritage Impact Assessment.</p> <p>Furthermore, hiding the scheme behind hedgerows and enclosing PROW with high hedges will also significantly change the way in which the character of the agricultural landscape can be experienced in the context of the conservation area and listed buildings around the application site and is not necessarily encouraged as mitigation.</p>	<p>The Applicant's methodology for the assessment of likely effects on the historic environment is set out in Section 7.5 of ES Chapter 7: Historic environment [CR1-003]. As indicated in Table 7.8 of that document, Conservation Areas are generally ascribed a 'Medium' level of sensitivity or value. For a proposed development to have a significant adverse effect on a heritage asset of 'Medium' sensitivity or value, the perceived magnitude of impact would need to be 'Medium' or greater, in other words the change within the setting of the asset would result in its heritage significance being clearly harmed (as per Table 7.9 in ES Chapter 7: Historic environment [CR1-003]). The purpose of Environmental Impact Assessment is to identify likely significant effects (rather than all effects) and therefore a proportionate approach is necessary.</p> <p>Screening of the proposed development with hedgerows is part of the overall mitigation with regard to landscape and visual impacts. Specifically with regard to the Cumnor Conservation Area and associated listed buildings, the new hedgerows and the reinforcement of existing hedgerows would not greatly affect the ability to appreciate and understand the historic character of the landscape.</p>	
4.2.7	ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]	The likely impact and effect on the Grade II listed Red House Farmhouse as a result of change within its setting.	<p>Red House Farm, a grade II listed farmhouse which lies to the north east of the application site is noted as likely to suffer a Negligible Adverse impact because of the development within its setting. This is due to a loss of the character of the agricultural land to which it was historically related, and which still forms part of its wider context.</p> <p>It is acknowledged that there will be no direct impact to the listed building. However, the manner of the agricultural countryside in which the building sits will be eroded by the presence of the proposed PV panels. The way the historic function of the farmhouse and its associated agricultural buildings is understood will be somewhat eroded by the loss of wider agricultural land.</p> <p>It is also noted that grazing is proposed under the panels, but this will not be readily visually understood beyond the 2.2m – 2.3m height of the panels, the fencing, proposed lighting and security systems and other infrastructure which will result in a semi-industrial appearance to the land instead of one of rolling Oxfordshire Countryside. An area of landscape enhancement is proposed to the north of the area in proximity to Red House Farm however this will only provide visual mitigation to some areas in the setting of the listed building. It will remain largely exposed and a change to the character of the land with some proposed hedgerow planting along the boundary edge used to soften it. Hiding the scheme behind hedgerows and enclosing PROW with high hedges will also significantly change the way in which the character of the agricultural landscape can be experienced which is not necessarily encouraged as mitigation.</p> <p>Although there is some intervening land remaining as an agricultural buffer to the farmhouse and farm group, the impact goes beyond negligible in my opinion and will have an adverse impact on the manner in which the listed building is understood and gains significance from its wider context. The impact is Minor Adverse and should be outweighed by public benefits as per National and Local Policy Tests.</p>	<p>The Applicant's assessment of the likely impact on the heritage significance of the Grade II listed Red House Farmhouse is presented in paragraphs 1.9.129 – 1.9.132 of ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014].</p> <p>The assessment considers the wider rural setting of the farmhouse, particularly the land to the south. The nearest proposed solar PV panels would be 450 m from the farmhouse, therefore a sizeable buffer of this rural landscape would be retained. The Applicant maintains that the heritage significance of the farmhouse would be barely affected, therefore the correct likely magnitude of impact is 'negligible adverse', resulting in a long-term, reversible, 'negligible adverse' effect which is not significant in EIA terms.</p> <p>The Applicant agrees that this harm to the significance of the Grade II listed building should be weighed against the public benefits of the proposed development in accordance with national tests, specifically the test set out in paragraph 5.9.32 of NPS-EN1.</p>	Discussions remain ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
4.2.8	ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]	The consideration of likely impacts and effects on heritage assets as a result of the construction and operation of the NGET substation.	<p>The lack of information about the NGET substation which is anticipated to be very large and sited somewhere in or adjacent to the southern parcel substation is a concern. Although it will occupy a smaller area than the fields of panels, the scale of the infrastructure needed is unlike anything else in this area and will likely rely heavily on topography to reduce the impact from some areas.</p> <p>There is a real concern that the impacts will be entirely unmitigated due to necessity if the proposal is granted approval. It should therefore be proposed alongside this scheme in order that it can all be appropriately impact assessed with holistic mitigation used where possible.</p> <p>The Photomontages of Viewpoint 50 show a visualisation of the substations proposed in this area. The indicative scale of the Main and Secondary Substations (Work No.3a and 3b on the Works Plans) are very large structures in an area not characterised by built form of any real scale beyond historic farm buildings. It is clear even from these visualisations that this will result in a significant change to the character of the landscape and its contribution to nearby assets. The impact of this has not been fully assessed as specific plans do not appear to form part of this application. This forms a fundamental part of the overall proposal being a necessary part of the scheme for it to become operational. Likewise, the NGET connection is an absolute necessity for the scheme but there are no details provided other than the anticipated size of the building footprint of 87m x 30m, a 12m height and additional 12.5m gantry heights on an area of land up to 3.8ha in area. This will have a considerable impact on the character of the area that forms the setting of the assets noted above but heritage impact assessment from detailed proposals has not been done.</p>	Where relevant, the location and likely scale of the National Grid Substation have been included within the assessment of likely impacts and effects presented in ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]. This substation is mentioned in the assessment regarding Red House Farmhouse (paragraphs 1.9.129 – 1.9.132), Upper Whitely Farmhouse (paragraphs 1.9.133 – 1.9.136) and also Tumbledown Cottage (paragraphs 1.9.177 – 1.9.180).	Discussions remain ongoing.
4.2.9	ES Chapter 7: Historic environment [CR1-003]	The use of the terms 'reversibility' and 'temporary' within the assessment of impacts and effects.	<p>Heritage impacts are consistently concluded as being reversible. Paragraph 1.10.6 of Appendix 7.5: Settings Assessment for example concludes "All effects would be fully reversible." This is on the basis that the proposal is 'temporary' in nature for a period of 45 years. Discussion and debate on how much weight should be given to this 45-year period should form part of a robust balancing exercise. This period would mean that an entire generation will experience the proposed semi-industrial appearance of the landscape as the character which forms the setting of these assets. This would also result in a large proportion of the population not experiencing the reinstatement of the agricultural landscape in the setting of these again in their lifetime.</p> <p>For these reasons it is recommended that it should be carefully considered how much weight 'temporary' should be given and whether assessment should be as if the proposed works will be permanent in terms of how heritage assets are experienced by a generation. This should also be considered against the proposed environmental and bio-diversity enhancements which are likely to become permanent features in the landscape.</p>	<p>Reversibility is a consideration that is commonly taken into account when planning decision-makers are considering impacts and effects on the environment. For example, paragraph 2.8.352 of the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) which deals with seascape and visual effects arising from offshore wind projects states '<i>Where adverse effects are anticipated either during the construction or operational phases, in coming to a judgement the Secretary of State should consider the extent to which the effects are temporary or reversible</i>'.</p> <p>The assessment of likely impacts and effects resulting from changes within the settings of heritage assets is presented in ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]. In this document, the reversibility of effects is noted but does not actually form part of the assessment process, i.e. the assessed magnitude of impact and hence the level of effect do not take account of the reversibility or irreversibility of the impact. The word 'temporary' does not appear in the assessment of likely impacts and effects resulting from changes within the settings of heritage assets presented as ES Appendix 7.5: Settings Assessment (Rev 1) [REP2-014]. In that document the impacts and effects are described as 'long-term'.</p>	Discussions remain ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
				<p>Within ES Chapter 7: Historic environment [CR1-003] the term 'time-limited' is also used. The use of the terms 'temporary' and 'time-limited' should be seen in the context of national planning policy, specifically paragraph 2.10.66 of NPS-EN3 which addresses the project lifetime of solar farm developments and which states '<i>Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed</i>'. The preceding paragraph of NPS-EN3 refers to an upper limit of 40 years as typical (for solar farm developments). Therefore, it is clear that national policy regards impacts arising from time-limited consents for solar farms as 'temporary'.</p> <p>The Applicant agrees that some of the proposed environmental mitigation measures may become permanent features in the landscape, specifically any new hedgerows that are planted as part of the mitigation for likely landscape and visual effects. Any new hedgerows would thus become part of the setting of heritage assets and would also be a 'new' element of the historic landscape. However, the removal and adjustment of field boundaries is a continuous process as landscape change over time. Major changes can occur such as the change from the medieval open-fields to enclosure landscapes such as those seen across most of Oxfordshire, but most change is much more gradual. The insertion of new hedgerows required for the proposed development is unlikely to result in a significant impact on heritage assets or on the overall character of the historic landscape.</p>	

Table 4.3: Areas of Discussion between the Parties – Agricultural Land Use and Public Rights of Way

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
4.3.1	ES Chapter 17: Agricultural land use and Public Rights of Way [APP-054] .	Over 40% (216ha) of the land proposed for solar PV would be on BMV land, with 80.5ha of productive arable land in the Vale, and at least 4ha permanently lost to the National Grid substation, highlighting concerns about the cumulative impacts of solar development on BMV land.	Loss of BMV land (RR-1086-5): In relation to agricultural land use, over 40% (216ha) of the land proposed for solar PV would be sited on BMV land, with some 80.5ha of productive arable land in the Vale, identified as a mixture of Grade 2, 3a and 3b arable land. At least 4ha of this will be permanently lost through siting of the National Grid substation. It is also important to highlight the cumulative impacts of solar development on BMV agricultural land, as several solar proposals are currently under consideration locally. Further comments on cumulative impacts and impacts on BMV will be provided through the LIR.	<p>The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6).</p> <p>Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function</p>	Discussions remain ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
				<p>(ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8).</p> <p>The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). This agrivoltaic approach has been adopted in other DCO applications, such as Cleeve Hill Solar Park (2020), Little Crow Solar Park (2022), and Sunnica Energy Farm (2024). The commitment to retain agricultural land use is included in the Outline Landscape and Ecology Management Plan [APP-235], secured under Requirement [X] of the Draft DCO [AS-009].</p> <p>Table 17.23 of ES Chapter 17 [APP-054] sets out the other projects, plans and activities considered in the CEA for agricultural land use and PRoW, which include other solar developments within the cumulative study area. The cumulative impacts between the Project and other proposed developments, including nearby solar developments on agricultural land quality and land use are considered in section 17.11 of ES Chapter 17 [APP-054].</p>	

Table 4.4: Areas of Discussion between the Parties – Landscape and Visual Resources

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
4.4.1	Chapter 8: Landscape and Visual Impact Assessment [APP-045]	LVIA Methodology	Other than where noted below, regarding specifics of the application of the LVIA methodology, the scope and methodology w agreed at a meeting with the OHAs dated 10th June 2025.	Other than where noted below, regarding specifics of the application of the LVIA methodology, the scope and methodology w agreed at a meeting with the OHAs dated 10th June 2025.	Agreed
4.4.2	Chapter 8: Landscape and Visual Impact Assessment [APP-045]	Assignment of significance	The OHAs believe that the LVIA [APP-045] has, many cases, underplayed the level of significance for a number of Representative Viewpoints	<p>A review of Representative Viewpoints within the LVIA is being completed to determine whether we believe our assessment is correct and in accordance with the agreed methodology. The Applicant's current position remains as follows:</p> <p>When judging the overall significance of effect, GLVIA3 reiterates the need to clearly distinguish between effects which are significant and those which are not. Paragraph 3.32 of GLVIA3 explains that there are no hard or fast rules about what effects should be deemed to be significant. The assessment within Chapter 8: Landscape and Visual Impact Assessment [APP-045] are influenced by the proportionality principle expressed in paragraph 1.17 of GLVIA3 "identifying significant effects stresses the need for an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional. This does not mean that effects should be ignored, or their importance minimised but that assessment should be tailored to the particular circumstances in each case."</p> <p>Neither the EIA Regulations or GLVIA3, nor subsequent landscape Institute technical guidance notes set out a formulaic/standard set of criteria / definitions for sensitivity, magnitude of impact or significance.</p>	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
				<p>The LVIA uses the methodology set out at sections 8.4 and 8.6 of the submitted LVIA [APP-045]. The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24).</p> <p>LI TGN-2024-01 provides clarification in the assessment of effects “...if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not.” (Issue / Question 3(5), Page 8).</p> <p>In assessing significance of effect, the LVIA has followed the methodology as set out in Sections 8.4 and 8.5 of the LVIA [APP-045].</p> <p>The numbers of people using the public rights of way network within the 5 m study area varies, as does the distance, context and visual characteristics of the view. It is not known how people use sections of a Public Right of Way, in which direction and when. Where no firm data are available a relative judgement is sufficient, as proposed in GLVIA3, Therefore, the position has been adopted of individuals using a public rights of way walking towards or through the Project, looking directly at the Project, even if wider views are available. Regarding valency, the position has been taken of that of a person who objects to the presence of the Project.</p> <p>It is the Applicant’s position that the methodology used to assess the landscape and visual effects, of the Botley West Solar Farm Project, follows best practice guidance. The judgements made in the Landscape and Visual Impact Assessment (LVIA) are clear, transparent, correct and proportionate to the Project.</p>	
4.4.3	Chapter 8: Landscape and Visual Impact Assessment. [APP-045]	Suitability of Representative Viewpoint Selection and Photomontages	OHAs have questioned the number of Representative Viewpoint and photomontages used within the LVIA [APP-045].	<p>During discussions at the meeting with the OHAs the possibility of produced winter Year 15 photomontages was discussed. This would help support our position in terms of significance of effect and give the OHAs further clarity. The Applicant’ current position remains as follows:</p> <p>The 55 Representative Viewpoints were consulted on and agreed with the host authorities (ref. Table 8.5 of Chapter 8: Landscape and Visual Resources [APP-045]). The number of selected viewpoints and their locations is considered proportionate to the Project.</p> <p>Of the 55 Representative Viewpoints, 33 were selected for photomontages [APP-072 to 080]. These were agreed with the local planning authorities and considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance [APP-149]. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA [APP-045].</p> <p>At no point were aerial viewpoints suggested, either by the Applicant or the local planning authorities. GLVIA3 only mentions aerial imagery twice, in the context 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.</p> <p>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. Land-based dynamic receptors are considered at paragraphs 8.6.44 to 8.6.65 of the LVIA [APP-045].</p>	Discussions ongoing.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
4.4.4	Chapter 8: Landscape and Visual Impact Assessment. [APP-045]	Mitigation	OHAs and other RRs have questioned the suitability of mitigation proposals.	<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 [REP2-016]. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays.</p> <p>The Project's main elements, the solar panels, would be low in height, at a maximum of 2.3m, and follow the natural contours of the landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located.</p> <p>Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that “infrastructure to achieve our energy objectives national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation” (NPS EN-1, paragraph 3.3.63). The NPS explains further that with “projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero” (NPS EN-1, paragraph 4.1.7). The residual landscape and visual effects, after the proposed mitigation do not present an unacceptable risk to the matters listed.</p>	Discussions ongoing
4.4.5	[APP-045] Chapter 8: Landscape and Visual Impact Assessment.	Representative Viewpoints		<p>The Representative Viewpoints, agreed with the LPAs are as they are named – i.e. they are representative of available views along certain routes and within the local landscape. Where these are based on a route a summary for the whole route is included in the description of effects, e.g. for Representative Viewpoint 1, an assessment of the effects experienced by people using the whole route during the operational phase is given in paragraph 8.9.144 of Chapter 8: Landscape and Visual Impact Assessment [APP-045].</p> <p>It is acknowledged that the assessment of the effects on PRowS does not include detailed section by section descriptions of the change in views along each PRow or road. However, the 54 viewpoints provide a good range of evidence of the different effects on the PRow within the study area, at varying geographical locations, distances and elevations, as well as different contexts, to enable professional judgement to be exercised in the assessment of effects along the wider networks.</p>	Discussions ongoing

Table 4.5: Areas of Discussion between the Parties – Noise and Vibration

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
4.5.2	6.3 - ES Chapter 13 - Noise and Vibration [APP-050]	Assessment approach, scope and methodology	The methodology which has been utilised for the noise and vibration assessment is broadly agreed.	The scope and methodology utilised for the noise and vibration assessment has been broadly agreed with VoWHDC. The assessment has been undertaken in line with best practice. This was confirmed and agreed during a virtual meeting on the 16th July 2025.	Broadly agreed.
4.5.1	6.3 - ES Chapter 13 - Noise and Vibration [APP-050]	Baseline noise survey methodology	The scope and methodology utilised for the baseline noise survey has been broadly agreed with VoWHDC.	The scope and methodology utilised for the baseline noise survey has been broadly agreed with VoWHDC . The assessment has been undertaken in line with best practice. This was confirmed and agreed during a virtual meeting on the 16th July 2025.	Broadly agreed.
4.5.34.5.2	6.3 - ES Chapter 13 - Noise and Vibration [APP-050]	Baseline noise survey methodologyAssessment Findings	The scope and methodology utilised for the noise and vibration assessment has been agreed. The findings of	No changes have been made from the current position. The findings of the assessment have been discussed and are broadly agreed with VoWHC. This was confirmed and agreed during a virtual meeting on the 16th July 2025.	Broadly agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
			the assessment have been discussed and are broadly agreed with VoWHC.		

Table 4.6: Areas of Discussion between the Parties – Planning Policy

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
4.6.1	Planning Supporting Statement	<p>Application of Planning Policy to Decision Making for NSIP's</p> <p>Section 104 of the Act contains the most pertinent policy outlining the decision-making process for NSIPs and providing guidance on how the Secretary of State (SoS) should approach their decisions. In this respect, Section 104 (3) provides that the SoS must decide applications for development consent in accordance with any National Policy Statement (NPS) except to the extent that the SoS is satisfied that one or more of the following exceptions apply:</p> <ul style="list-style-type: none"> that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations; that deciding the application in accordance with any relevant national policy statement would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under enactment; That deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment; and That the Secretary of State is satisfied that the adverse impact of the proposed development outweighs its benefits. <p>A such, it is agreed that the following NPSs make up the relevant primary policy, against which the SoS must make their decision and to the extent that Section 104 allows, the following national, regional and local policy may also be relevant.</p>	Agreed	Agreed	Agreed
4.6.2	Planning Supporting Statement	<p>Overview:</p> <p>The statutory framework for preparing, examining and determining application for DCOs for NSIPs is provided by the Act. As discussed in section 2, the Act sets out the consenting system for all NSIPs, including those in the energy sector, and provides the legislative context that has guided the below considerations.</p> <p>The relevant NPSs to which the SoS must have regard in accordance with Section 104 (2) and 104 (3) of the Act are considered to be:</p> <ul style="list-style-type: none"> National Policy Statement for Energy (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and National Planning Statement for Electricity Networks Infrastructure (NPS EN-5). Other policies of relevance identified below include: National Planning Policy Framework NPPF and the Local Development Plan documents for the host authorities West Oxfordshire District Council, Cherwell District Council, the Vale of Horse District Council and Oxford City Council. <p>Appendices B to E attached detail national and local planning policy against which the project will be judged. These appendices are described as 'Compliance Tables', and details the applicants position in respect of degree on compliance with these policy statements well as the host authorities position with respect to compliance. Together they represent matters agreed and not agreed</p>	Agreed	Agreed	Agreed
4.6.3	Planning Supporting Statement	<p>Vale of White Horse Local Plan 2031 (Part 1 & Part 2) (adopted)</p> <p>The VoWH Local Plan 2031 Part 1 was adopted in December 2016 whilst the Local Plan Part 2 was adopted in October 2019. A Regulation 10A review of the Local Plan 2031 Part 1 was approved in December 2021 and showed that together with Local Plan 2031 Part 2, these documents continue to provide a framework for development that is in overall conformity with government policy.</p>	Agreed	Agreed	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
		The whole of the Southern Site lies within the administrative area of the VoWH, alongside the southern portion of cable routes. The following policies of the Vale of White Horse Local Plan 2031 Part 1 and Local Plan 2031 Part 2 are considered of relevance to the project.			
4.6.4	Planning Supporting Statement	<p>Vale of White Horse Local Plan (emerging)</p> <p>VoWH in conjunction with South Oxfordshire District Council are working on a Joint Local Plan 2041, the latest Local Development Scheme, adopted in September 2023, suggests that the Joint Local Plan 2041 will be adopted in December 2025. Due to the early stage of this plan, it attracts limited weight in the planning process and has not been considered here.</p> <p>Whilst at an early stage and subject to change, and therefore only attracting very limited weight in the planning process, the Joint Local Plan Preferred Options Consultation includes Policy DE5 – Renewable Energy which will encourage proposals for renewable energy schemes and community-led initiatives and set criteria detailing where the schemes and associated infrastructure will be supported. The supporting text for Policy DE5 currently states “We recognise that Solar PV will contribute significantly towards meeting out net zero targets, and therefore the Joint Local Plan will need to support it, alongside a range of other renewable energy opportunities ... The Plan will identify suitable areas for these schemes to ensure they are situated in appropriate locations.” The Preferred Option for Policy DE5 seeks to have a policy that encourages development of renewable energy generation schemes and associated infrastructure; identify broad areas of potential suitability for different types of renewable energy and; includes a set of criteria which all new renewable energy schemes will have to meet. Whilst draft wording of Policy DE5 has been proposed in the Preferred Options document, the areas identified as potentially suitable for ground mounted solar development will be published as the next stage of consultation and are to be defined through further evidence.</p> <p>The Joint Local Plan 2041 is likely to advance through the plan-making process during the DCO application timeframe; therefore, the weight to be given to the Joint Local Plan 2041 may increase in accordance with Paragraph 48 of the NPPF as the review reaches more advance stages.</p>	<p>Agreed that the emerging Local Plan is not expected to be adopted prior to the end of Botley West Examination in mid-November 2025.</p> <p>In relation to Oxfordshire Authorities currently consulting on proposals for a new Unitary Authority/Authorities, no impact is anticipated; if reorganisation takes place (likely to be 2028 at the earliest) existing Plans will still continue until such time as a new Plan is prepared / adopted by any new Authority.</p>	Noted	Agreed
4.6.5	Planning Supporting Statement	<p>Vale of White Horse Neighbourhood Plans (made) – Cumnor</p> <p>The Cumnor Neighbourhood Development Plan was ‘made’ on 18th May 2021 and covers the period 2021 to 2031. The entirety of the Southern Site, xx ha, lies within the Cumnor Neighbourhood Development Plan Area. The relevant policies from the Cumnor Neighbourhood Development Plan are detailed below:</p>	Agreed	Agreed	Agreed
4.6.6	Planning Supporting Statement	<p>Vale of White Horse Neighbourhood Plans (emerging)</p> <p>No emerging neighbourhood plans exist within the proposed development area.</p>	Agreed	Agreed	Agreed
4.6.7	Planning Supporting Statement	<p>Compliance with the following NPS paras or policies</p> <p>1.NPS EN-1 paras: Please see Appendix B]</p> <p>2.NPS EN-3 paras: Please see Appendix C</p> <p>3.NPS EN-5 paras: Please see Appendix D</p> <p>4.NPPF paras: Please see Appendix E</p> <p>5.List Development Plans and other policies: Please see Appendix F</p>	Extent of compliance with NPSs suggested to be left to Examining Authority to determine.	Discussions ongoing	Not yet agreed

Appendix A

Record of Relevant Correspondence

Date	Form of Correspondence	Topics Discussed	Outcomes
Ecology			
14/03/2023	Meeting	Identified biodiversity and approach to Net Gain methodology as a key topic.	Nil.
3/05/2023	Meeting	Overview of ongoing surveys, designated sites and Biodiversity Net Gain.	Nil.
3/12/2024	Meeting	Protected species licensing.	Letter's of no impediment to be sought with Natural England for relevant species.
1/08/2024	Meeting	Set out of project update including methodologies and surveys to date, bats, results and key receptors, emerging impacts, Biodiversity Net gain and timetable.	September meeting to discuss bat radio tracking results.
19/09/2024	Meeting	Set out project update including ongoing design and progress update, Statement of Common Ground, key survey results, Biodiversity Net Gain, ecology strategy and next steps.	Nil
11/07/25	Meeting	Minutes to be agreed by areas covered included:	Nil

Date	Form of Correspondence	Topics Discussed	Outcomes
		<ul style="list-style-type: none"> • Overview of all bat survey work including that from May 2025 and activity data analysed to date. • Overview of Change Request 2 submitted at D2. • Proposed 25m buffer locations on key bat flightlines plus discussion on location and extent of other buffers. • Provision of bat technical note including contents. • Scope of potential air quality assessment in respect of Oxford Meadows SAC. • Discussion on Local Impact Report Responses. • Discussion on proposed skylark mitigation. • Discussion on nightingale enhancements to OLEMP. <p>Discussion on monitoring programs and approval process.</p>	

Historic Environment

July 2023	VoWHDC input into Scoping Opinion	Various	n/a
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Date	Form of Correspondence	Topics Discussed	Outcomes
February 2024	VoWHDC response to PEIR	Various	n/a
February 2025	VoWHDC response to DCO submission	Various	n/a

Agricultural Land Use and PRoW

November 2024	Online meeting via Microsoft Team	Meeting with PRoW Officer from VWHDC to discuss the proposed management of PRoW within the Project site, including temporary and permanent diversions.	Responses received during the meeting were used to inform the assessment reported in ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054] and measures included in the Outline PRoW Management Strategy, which forms Annex B of the - Outline Code of Construction Practice - Part 1 [APP-232].
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Landscape and Visual Resources

<u>October / November 2022</u>	<u>Correspondences (by email) with all local authorities regarding the selection of Representative Viewpoints.</u>	<u>A detailed log was kept of the responses and any requested for additional/alternative viewpoints. Any changes were incorporated into the PEIR and subsequent ES chapter.</u>	<u>Progressed.</u>
<u>January 2023</u>		<u>Meeting held with OCC (including Landscape Officer) to discuss matters arising on Project, including Landscape</u>	<u>Minutes of meeting issued and actioned where necessary.</u> <u>Progressed.</u>

Date	Form of Correspondence	Topics Discussed	Outcomes
June 2023	Submission of Scoping Report, including LVIA section outlining approach to the assessment, including methodology.	Comments received from the Scoping report are detailed within the LVIA [APP-045] Table 8.5, with details of how they have been addressed.	Progressed.
September 2024	Meeting with local authority landscape officers to discuss LVIA specific matters.	Outcome of meeting actioned as part of the PEIR / ES	Progressed.
April 2023	Email	Consultation was sought via email to agree upon the proposed baseline sound survey and noise impact assessment methodologies.	Not agreed at that stage.
10th June 2025	Online meeting with local authority landscape officers to discuss LVIA specific matters	Topics of specific discussion were focused around the OHAs Joint Local Impact Report submitted at Deadline 1. With a particular focus on the LVIA methodology and application of significance of effect.	A detailed response to the OHAs Joint LIR (and appended LUC report) would be responded to at Deadline 2. Agreement was reached on the LVIA methodology.
Noise and Vibration			
April 2023	E-mail	Consultation was sought via email to agree upon the proposed baseline sound survey and noise impact assessment methodologies	No response was received
July 2024	E-mail	The proposed noise and vibration assessment methodology was	No response was received

Date	Form of Correspondence	Topics Discussed	Outcomes
		issued to VoWHDC via email.	
<u>16th Jul 2025</u>	<u>Virtual Meeting</u>	<u>Noise and vibration assessment methodology, baseline methodology & derivation of data, & assessment findings</u>	<u>Agreed and confirmed</u>
Planning Policy			

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Appendix B

NPS EN-1 Compliance Table

National Policy Statement for Energy (NPS EN-1), November 2023

Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.2.1	‘In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases (‘GHG’) emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.’	The delivery of the Botley West is a very important part of ensuring the UK Government meets its legally binding net zero obligations and in meeting its goal of 70GW of solar by 2035.	
2.3.3	‘Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system.’	The scale of the problem is great; the scale of the solution needs to respond accordingly. Even with the addition of 840MW of renewable energy from the Botley West project, there is still a very significant shortfall of solar projects coming forward to meet the Government's target of 70GW by 2035 (see for example ES Chapter 5, paras 5.1.19 to 5.1.22 ref [EN010147/APP/6.3]).	
2.3.4	‘Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level’	See response to paragraph 2.2.1 and 2.2.3 above.	
3.2.1	‘The government’s objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios’	See response to paragraph 2.2.1 and 2.2.3 above.	
3.2.3	‘It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for	The investment provided by PVDP and Solar Five Ltd, for the Botley West project is significant and necessary to increase the supply of this	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government'	type of Critical National Priority infrastructure.	
3.2.4	'It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types'	The scale of the problem is great; the scale of the solution needs to respond accordingly. Even with the addition of 840MW of renewable energy from the Botley West project, there is still a very significant shortfall of solar projects coming forward to meet the Government's target of 70GW by 2035 (see for example Chapter 5, paras 5.1.19 to 5.1.22). More renewable energy developments are required, need approval and to be implemented.	
3.2.6	'The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.'	Some third parties opposing the Project question its need. This statement makes clear that the need has already been demonstrated.	
3.2.7	'In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.'	This is noted and welcomed by the Applicant.	
3.2.8	'The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.'	This is noted by the Applicant. However, it is important to also note that all host authorities have declared a climate emergency and Botley West coming forward can help	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		positively address that emergency.	
3.3.12	<p>Decentralised and community energy systems such as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the Government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives. This is because connection of large-scale, centralised electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.</p>	<p>Some third parties claim roof top solar can satisfy Government targets in relation to solar (70GW by 2035). However, this statement makes clear that the Government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives.</p>	
3.3.20	<p>‘Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.’</p>	<p>Noted. The Botley West solar farm will perform a critical role in the delivery of net zero by 2050.</p>	
3.3.62	<p>‘Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2</p>	<p>Noted. Solar is one such example of low carbon technology and therefore is CNP infrastructure (see 4.2.5 below).</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	states which energy generating technologies are low carbon and are therefore CNP infrastructure.'		
3.3.63	<p>'Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible.'</p>	<p>The weight to attributed to CNP infrastructure in the planning balance is noted and welcome.</p> <p>The Applicant is not aware nor expects any legal impediment that would prevent a positive decision being taken by the Secretary of State in respect of the Botley West Project. The Applicant has mitigated significant adverse effects and is left with residual impacts, none of which are considered significant adverse and many of which are beneficial.</p> <p>In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.</p>	
3.3.65	<p>'There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.'</p>	<p>Botley West is likely to be one of the first solar NSIP's to connect to the national grid and start supplying affordable, clean and secure energy into the system. A grid connection offer has already been made to the Applicant and it expected to connect to the national grid in 2028. This is a material consideration in the planning balance.</p>	
3.3.83	<p>'Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.'</p>	<p>See response to paragraph 3.3.65 above.</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
4.1.3	<p>'Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.'</p>	<p>The presumption in favour of CNP infrastructure in the planning balance is noted and welcomed. There is no policy at local or national level that clearly indicates that permission should be refused. Whilst there is some conflict with Green Belt policy, very special circumstances exist that outweigh harm caused by inappropriateness and any other harm - see planning balance conclusion and Appendix 8 in this report.</p> <p>In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.</p>	
4.1.5	<p>'In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:</p> <ul style="list-style-type: none"> its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy' 	<p>Noted. See planning balance conclusion in this report.</p> <p>In the opinion of the Applicant, the planning balance is overwhelmingly in favour of the Project.</p>	
4.1.7	<p>'Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the</p>	<p>Noted. Please refer to the planning balance conclusion in this PSS.</p> <p>In the opinion of the Applicant, the planning</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development'	balance is overwhelmingly in favour of the Project.	
Other documents			
4.1.12	'Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.'	Noted. These are set out and assessed in this report. The Applicant considers the Project is compliant or substantially in compliance with relevant Development Plans and other policy documents.	
4.1.13	"Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded.'	Noted. This assessment is set out in this report.	
4.1.14	'The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it.'	Noted. This assessment is set out in this report.	
4.1.15	'In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.'	Noted.	

Development consent

Paragraph	Details	Applicant Comments	Planning Authority Comments
4.1.16	<p>'The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.'</p>	<p>Noted. The Applicant has devised a list of Draft Requirements which meet these tests.</p>	
4.2.2	<p>Ensuring the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy. The UK's strategy to increase supply of low carbon energy is dependent on deployment of renewable and nuclear power generation, alongside hydrogen and CCUS. Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale.</p>	<p>Botley West is likely to be one of the first solar NSIP's to connect to the national grid and start supplying affordable, clean and secure energy into the system. A grid connection offer has already been made to the Applicant. The connection date is assumed to be October 2028.</p>	
4.2.5	<p>'... Low carbon infrastructure for the purposes of this policy means:</p> <ul style="list-style-type: none"> • for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion and other plants that convert residual waste into energy, including combustion, provided they meet existing definitions of low carbon; and nuclear generation), as well as natural gas fired generation which is carbon capture ready • for electricity grid infrastructure, all power lines in scope of EN-5 including network 	<p>Noted. Solar farms fall within the scope of this definition.</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<p>reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System</p> <ul style="list-style-type: none"> • for other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of “low carbon”, such as hydrogen distribution, and carbon dioxide distribution • for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of “low carbon”, such as interconnectors, Multi-Purpose Interconnectors, or ‘bootstraps’ to support the onshore network which are routed offshore • Lifetime extensions of nationally significant low carbon infrastructure, and repowering of projects.’ 		
4.2.6	<p>‘The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all</p>	<p>The need case and weight to be attributed to renewable projects is noted and Botley West benefits from this support.</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	assessments of energy infrastructure applications.'		
4.2.10	'Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.'	Noted. This document clarifies compliance.	
4.2.11	'Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.'	Noted. This is the approach that is taken in the Environmental Statement. Residual effects are reported in Chapter 21 of the ES, summarised in Table 22.1. These are the effects after adverse impacts have been the subject of avoidance through design and layout and/or the application of relevant and reasonable mitigation measures.	
4.2.12	'Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.'	Noted. This is the approach that is taken in the Environmental Statement.	
4.2.13	'Where residual impacts relate to HRA or MCZ sites then the Applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance.'	Noted. There are no residual impacts that relate to HRA or MCZ sites.	
4.2.15	"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely	Noted. The Applicant welcomes this consideration.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts'		
4.2.16	<p>'As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.'</p>	Noted. This is also the welcomed by the Applicant. See Planning balance and conclusion in this report.	
4.2.17	<p>'This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:</p> <ul style="list-style-type: none"> • where development within a Green Belt requires very special circumstances to justify development; • where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs. • where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and • where substantial harm to or loss of significance to heritage assets 	Noted. This is welcomed by the Applicant. See also the Planning balance and conclusion in this report.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	should be exceptional or wholly exceptional'		
4.3.1	'All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.'	The Applicant has submitted an ES with the Draft DCO.	
4.3.3	'The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.'	Noted. The Environmental Statement has identified and assessed the likely significant effects on the environment. A Mitigation Measures and Commitment Schedule has also been produced [EN010147/APP/6.5].	
4.3.4	'To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.'	Noted. This is the approach that is taken in the Environmental Statement.	
4.3.5	'For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects	Noted. This is the approach that is taken in the Environmental Statement.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	arising from pre-construction, construction, operation and decommissioning of the project.'		
Applicant assessment			
4.3.10	'The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.'	Noted. This is the approach that is taken in the Environmental Statement.	
4.3.11	'In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case'	Noted. This is the approach taken in the ES – see in particular Chapter 4 – Methodology, and Chapter 6 – Project Description	
4.3.12	'Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.'	Noted. This is the approach that is taken in the Environmental Statement.	
4.3.15	'Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.'	Noted. This is the approach that is taken in the Environmental Statement. See also Chapter 5 – Alternatives and Chapter 6 – Project Description.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
4.3.17	'Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.'	See response to paragraph 4.3.15.	
4.3.24	'The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals'.	Noted. Notwithstanding, the Applicant has set out how they came to select the subject site, the design evolution, and has set out the Very Special Circumstances to explain why development of that part of the site within the Green Belt should be allowed.	
4.3.27	'Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.'	Noted.	
4.3.28	'Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.'	Noted. This statement may be of relevance to third parties who have sought to suggest alternative sites or approaches to development. Notwithstanding, the Applicant has set out in some detail the site and design evolution of the Project – see Chapter 5 – Alternatives, and Layout and Design Principles document [EN010147/APP/7.7]	
4.3.29	'It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an	Noted. The main alternative proposed by third parties during consultation has been roof mounted solar or in some cases wind turbines.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<p>application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.'</p>	<p>The Applicant is a solar developer.</p> <p>Wind turbines are considered to give rise to adverse visual effects over a wide area, and unacceptable effects in terms of the setting of The Blenheim Palace World Heritage site.</p>	
Health			
4.4.2	<p>'The direct impacts on health may include</p> <ul style="list-style-type: none"> • increased traffic • air or water pollution • dust, odour • hazardous waste and substances • noise • exposure to radiation, and • increases in pests' 	<p>Noted. Where relevant these matters are addressed in the Human Health Chapter [EN010147/APP/6.5].</p>	
4.7.2	<p>Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the</p>	<p>The Applicant has limited influence over design of the electrical infrastructure associated with the Project. The NGET substation will ultimately be designed and laid out to meet relevant technical, engineering and safety parameters. However, parameters have been established for the envelope within which this has been assessed (Chapter 6 – Project Description). Design approval of the solar arrays, and other electrical infrastructure will be agreed with the relevant planning</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	enhancement of the quality of the area	authority via a Requirement in the DCO.	
4.7.3	Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	NGET intends to build their substation using Gas Insulated technology rather than Air Insulated technology; this results in a substation that is smaller and quieter than would otherwise be the case, and so is better environmentally in terms of visual impact and noise effects. Siting of other noise generating equipment has been undertaken in a way to be remote from sensitive receptors and/or designed with additional mitigation measures to reduce adverse noise effects (Please also refer to Layout and Design Principles documents [EN010147/APP/7.7]).	
4.12.9	'In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves.'	Noted. However, the Applicant has set out a series of Mitigation Measures and Commitments [EN010147/APP/7.6 onwards] , and a series of Management Plans, the purpose of which is to avoid or reduce relevant adverse environmental effects arising from the Project.	
5.11.20	'The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and if it is, whether their proposal may be inappropriate development within the meaning of Green	The Applicant has set out the VSC applicable to their Project within this Planning Supporting Statement (refer to Appendix 8) Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Belt policy (see paragraph 5.11.36 below).'		
5.11.34	<p>'The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.'</p>	<p>Noted. For full details please refer to Chapter 17 – Agriculture, Landuse and PRow.</p> <p>[EN010147/APP/6.3]</p> <p>Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project outweigh the impact upon BMV land.</p>	
5.11.37	<p>'Very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. However, when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation. Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources.'</p>	<p>Noted. The Applicant has set out the VSC applicable to their Project within this Planning Supporting Statement.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	

Appendix C

NPS EN-3 Compliance Table

National Policy Statement for Renewable Energy Infrastructure (NPS EN-3)

November 2023 Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
General Assessment and Technology Specific Information			
Factors influencing site selection and design			
National designations			
2.3.6	‘When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.’	<p>Noted. The location of the Project does not fall within nationally recognised designations.</p> <p>For compliance see Appendices B to E and Section 4.0 of this PSS.</p> <p>The Applicant considers the Project is in accordance or substantially in accordance with relevant Development Plans and other policy documents.</p>	
2.3.8	‘In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the	<p>Noted. For full details please refer to Chapter 14 – Heritage [EN010147/APP/6.3] and section 4.3 of the PSS. In summary, the Project avoids important underground archaeology, removing development from such areas, and avoids significant adverse effects upon setting through a combination of distance and/or screening from heritage assets, including The Blenheim Palace WHS. In respect of the latter the Applicant has produced a Heritage Impact Assessment at Appendix 14 of Chapter 9 of the ES.</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	urgency of meeting the net zero target.'		
Other locational considerations			
2.3.9	'As most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments).'	The absence of any limit on need is welcomed as is the avoidance of taking a consecutive approach in the consideration the location of renewables i.e. not giving priority to previously developed land. Please also see Chapter 5 – Alternatives [EN010147/APP/6.3] for the explanation and rationale for the Applicants choice of site etc.	
Climate change adaption and resilience			
Solar photovoltaic			
2.4.11	'Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: <ul style="list-style-type: none"> increased risk of flooding; and impact of higher temperatures.'	Please refer to Chapter 10 - Hydrology and Chapter 15 on Climate Change. No significant adverse effects are predicted.	
Consideration of good design for energy infrastructure			
2.5.2	'Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.'	This project design evolution is described in Chapter 6, Alternatives. Please also refer to the illustrative masterplans, the Landscape, Ecology and Amenities Plan [EN010147/APP/7.6.3], and in the Layout and Design Principles document [EN010147/APP/7.7].	

Paragraph	Details	Applicant Comments	Planning Authority Comments
Flexibility in the project details			
2.6.1	'Where details are still to be finalised, applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case.'	Please refer to Chapter 6 – Project Description [EN010147/APP/6.3] and the list of Requirements within the Draft Order, which refer to plans/measures requiring subsequent approval.	
2.6.2	"Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.'	This is the approach that has been taken in the Environmental Statement. For details, please refer to Chapter 4 of the ES, Approach to Assessment [EN010147/APP/6.3]	
Solar Photovoltaic Generation			
Introduction			
2.10.10	'Solar also has an important role in delivering the government's goals for greater energy independence. The British Energy Security Strategy states that government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is "co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use".'	It is acknowledged by the Applicant that there are many schemes currently in the consenting process. The largest schemes are listed on the PINs website and an analysis of their capacity and status can be found at Annex A. However, even if all of these are consented, built and connected before 2035, this would only add approximately 15.2GW to the 15.8GW of installed capacity reported in the House of Commons briefing paper from May 2024 i.e. a total potential capacity of approximately 31.0GW. This includes the potential contribution of the Project of an anticipated 840MW, and which has the benefit of a confirmed grid connection offer of October 2026 (but for ES purposes is assumed to be October 2028). At this point therefore, there is still a significant shortfall in the 70GW Government target, of	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		<p>approximately 39GW (see DCO Solar Capacity Calculation, Chapter 5, Alternatives, ref [EN010147/APP/6.3])</p> <p>The Botley West scheme does not include battery storage; other battery storage facilities are available nearby to help balance the grid.</p> <p>The Botley West Project does retain and support ongoing agricultural use of the land.</p>	
2.10.11	<p>'The Powering Up Britain: Energy Security Plan⁸¹ states that government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.'</p>	<p>See 2.10.10 for urgency to deliver solar farms and other forms of renewables and response to 2.3.9 in respect avoiding a consecutive approach to prioritising specific land use types to locate renewable energy projects.</p> <p>The Applicant will also retain an agricultural use of the land through conservation grazing, make available up to 30 ha of land for local food growing initiatives, and make available land for educational use (refer to Chapter 6 of the ES and the oOMP and oLEMP [EN010147/APP/7.6.2] and [EN010147/APP/7.6.3].</p>	
Applicant Assessment			
Factors influencing site selection and designation			
Irradiance and site topography			
2.10.19	<p>'Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing</p>	<p>Irradiance has been an important, but not overriding, factor in optimising the design and layout of the Project. See also the Layout and Design Principles document [EN010147/APP/7.7].</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site'		
2.10.20	'In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order further to maximise the solar resource.'	See response to paragraph 2.10.19. The applicant has chosen a fixed rather than rotating scheme.	
Network Connection			
2.10.21	'Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5'	The Applicant has been in ongoing discussion with National Grid (NGET) and has the benefit of a grid connection offer from NGET (assumed connection date October 2028). The Applicant has included a new NGET substation within the Order Limits as part of its Draft DCO. See also Chapter 6 for approach to assessment of the NGET substation [EN010147/APP/6.3] .	
2.10.23	'Larger developments may seek connection to the transmission network if there is available network capacity and/or supportive infrastructure.'	Noted – see above.	
2.10.24	'In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.'	Noted. The Applicants' site selection process has been influenced by network capacity leading them to the Project Site (refer to Chapter 5, Alternatives). The current illustrative layout shows the NGET substation within the Order limits and the customer substation adjacent.	
2.10.25	'To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce	The approach to connection is set out in the ES Chapter 6, and the Applicant already benefits from a Grid Connection offer from NGET. Availability of a	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	overall costs, applicants may choose a site based on nearby available grid export capacity.'	suitable connection point has influenced the Project site location (see Chapter 5, Alternatives).	
2.10.26	"Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.'	The Applicant has undertaken a cumulative impact assessment should the proposed location of the NGET substation be moved to an adjacent site. In this scenario the Applicant assumes its own infrastructure will replace the current NGET site.	
Proximity of a site to dwellings			
2.10.27	'Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections below'	Noted. Recognising that landscape and visual effects are one of the main environmental effects arising from solar farms, the Applicant has adopted a landscape led approach to the design and layout of the Project. Retention and enhancement of the existing landscape character has been one of the central features of the Project (See Landscape and Visual Resources chapter [EN010147/APP/6.3] and Layout and Design Principles Document [EN010147/APP/7.7].	
Agriculture land classification and land type			
2.10.28	'Solar is a highly flexible technology and as such can be deployed on a wide variety of land types'	It is also noted that solar is a CNP, and currently deployment of solar is significantly short of the Government's target of 70GW by 2035 (see for example ES Chapter 5, paras 5.1.19 to 5.1.22 [EN010147/APP/6.4]	
2.10.29	'While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary,	Then Applicant has explained its rational for the selection of the subject site (see Chapter 5 of the ES. Effects upon soils/BMV are considered in detail in Chapter 17– Agriculture, Landuse Soils and PROW [EN010147/APP/6.3]. No significant adverse effects are predicted.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible. ‘Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification’	Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project outweigh the impact upon BMV land.	
2.10.30	‘Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92 and 2.10.107 – 2.10.126.’	All these impacts are considered within relevant chapters within the ES and at section 4.3 of this PSS. No significant adverse effects are predicted.	
2.10.31	‘It is recognised that at this scale, it is likely that applicants’ developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.’	Then Applicant has explained its rational for the selection of the subject site (See Chapter 5 – Alternatives [EN010147/APP/6.3].	
2.10.32	‘Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolyzers) to maximise the efficiency of land use.’	The Applicant does propose continued agricultural use – see Chapter 6 – Project Description [EN010147/APP/6.3].	
2.10.33	‘The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and,	Soil sampling has been undertaken and has informed the Soil Management Plan and other management plans [EN010147/APP/7.6.1].	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.'		
2.10.34	'Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030.'	The Applicant has produced a Soils Management Plan [EN010147/APP/7.6.1]	
Accessibility			
2.10.35	'Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.'	The Applicant has defined and assessed the use of relevant links on the public highway during construction and operation. Full details are contained with Chapter 12–Highways. [EN010147/APP/6.3]. No significant effects are predicted.	
2.10.36	'Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting.'	See response to paragraph 2.10.35 above.	
2.10.37	'Developers will usually need to construct on-site access routes for operation and maintenance activities,	Internal maintenance roads are shown on the illustrative masterplans (see Figure 2.1a to 2.3 inclusive	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	such as footpaths, earthworks, or landscaping.'	[EN010147/APP/7.6.4]. New pedestrian access routes are shown on the Landscape, Ecology and Amenities Plan [EN010147/APP/6.3]. No significant earthworks are envisaged – of note, however, is a new water storage feature proposed north of Cassington, in order to reduce the effects of flooding that the village currently experiences intermittently. New earth bunds are also proposed in the same location to further assist in diverting water away from the village.	
2.10.38	'In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.'	Four new vehicular access points have been designed to serve the four construction compound areas [EN010147/APP/7.3.1 and 7.3.6]. The Applicant has used existing field accesses into the Project site where possible; this will also assist in the continued agricultural use of the site.	
2.10.39	'Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.'	This is the approach taken within the ES.	
Public rights of ways			
2.10.41	"Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.'	The Applicant has considered the effect of the Project upon existing rights of way (Please refer to Chapter 17– Agriculture, Land Use and PRoW and Health Chapter 16 [EN010147/APP/6.3]). Some adverse effects are predicted in the short term only.	
2.10.42	'Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible	This is the approach taken with the proposed development. PRoW diversions are proposed in four locations – see Chapter 16). New pedestrian access routes have also been created	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	during construction, and in particular during operation of the site.'	to increase access to this part of the countryside. A new permissive path was proposed by the Applicant during the consultation exercises along the route of the Evenlode. No third party expressed a wish for this to be delivered and so is not included in the Applicants submission.	
2.10.43	'Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.'	The layout of the solar installation, the height of the solar arrays (reduced height post the PEIR), combined with existing and new landscaping has, in combination, led to the avoidance or minimisation of adverse visual impacts of the Project upon sensitive receptors.	
2.10.44	Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.'	This is the approach taken with the Project. Existing rights of way have been retained and proposed to be enhanced. The Applicant has also consulted upon and now incorporated the provision of new pedestrian access routes (refer to Landscape, Ecology and Amenities Plan [EN010147/APP/7.3.3]).	
2.10.45	"Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.'	The Applicant has produced an outline Public Rights of Way Management Plan within the outline Code of Construction Practice and Operational Management plan [EN010147/APP/7.6.1] .	
Security and lighting			
2.10.46	'Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter	The Applicant is proposing lighting and security cameras and fencing. See Chapter 6, Table 6.3 [EN010147/APP/6.3]	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.'		
Technical Considerations			
Capacity of a site			
2.10.53	'From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.'	The total installed capacity is approximately 936,000 kVA Total apparent power in AC).	
2.10.55	"The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays."	The Applicant has assumed some degradation of the panels over time, and replacement as necessary. Details are contained in Chapter 14 – Climate Change and in Chapter 12 Transport [EN010147/APP/6.3].	
2.10.56	'AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to set the maximum extent of development when determining the planning impacts of an application.'	In table 6.3 of Chapter 6, the Applicant assumes a range for the following: total installation areas for the solar arrays; an indicative range for the number of solar modules; and an indicative dimension of the PV modules.	
2.10.58	"In particular, any permissions granted on the basis of a DC installed generating capacity should be built on that basis, unless an amendment is made to that permission	The Applicant does not wish to consent to be controlled by limitation to its generation capacity. Instead, as with other solar DCO consents (e.g. Mallard Pass, Gate Burton and Cottam), it wishes to secure consent by reference to when	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	and the difference in impacts is considered.	decommissioning is to start. As such Requirement 15 of the draft Order states that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.	
Site layout design, and appearance			
2.10.59	‘Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.’	See NPS EN-1 table above and section 4.7.2 and 4.7.3 within that table.	
2.10.60	As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land-use, and ability to mitigate environmental impacts and flood risk.’	See Chapter 5 – Alternatives, and the Layout and Design Principles Document [EN010147/APP/7.7] , where the approach to site selection and layout and design refinement and control is set out.	
2.10.61	‘For a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.’	The Applicant has continued to refine the layout of the solar installation having regard to power output, engineering, and planning and environmental considerations. The illustrative layout can be found in Figures 2.1 to 2.3 inclusive [EN010147/APP/6.4]	
2.10.62	‘In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen. For example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread	The Applicant has continued to refine the layout of the solar installation having regard to power output, engineering, and planning and environmental considerations. The illustrative layout can be found in Figures 2.1 to 2.3 inclusive [EN010147/APP/6.4] and the description of the design evolution is contained in Chapter 5 of the ES [EN010147/APP/6.3]	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	more evenly throughout the day.		
2.10.63	'It is likely that underground and overhead cabling will be required to connect the electrical assets of the site, such as from the substation to the panel arrays or storage facilities.'	No overhead cabling is proposed by the Applicant. However, where cabling crosses important archaeology, cables will be laid on the surface of avoid damage to the heritage asset.	
2.10.64	'In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.'	The Applicant has produced a report which provides details of cable laying methods, Volume 3, Appendix 6.2 [EN010147/APP/6.7]. An oOMP is also produced which describes the proposed operation and maintenance regime [EN010147/APP/7.6.2].	
Project lifetime			
2.10.65	'Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.'	The Applicant wishes to secure consent by reference to when decommissioning is to start. As such Requirement 15 of the draft Order states that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.	
2.10.66	'Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.'	<p>The Applicant seeks a temporary consent primarily because much of the site is within the Oxfordshire Green Belt. The Applicant considers it important to allow the Project to generate much needed renewable energy but for the Green Belt to continue to perform its function in the longer term for planning purposes. The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS.</p> <p>Notwithstanding, paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.10.67	Solar panel efficiency deteriorates over time and applicants may elect to replace panels during the lifetime of the site.'	The Applicant is assuming that replacement panels will be required over time and has allowed for this eventuality – Appendix 14.2 [EN010147/APP/6.5] .	
Decommissioning			
2.10.68	'Solar panels can be decommissioned relatively easily and cheaply. The nature and extent of decommissioning of a site can vary. Generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue.'	The Applicant describes its decommissioning proposals in Chapter 6 and in the Decommissioning Plan (see ref [EN010147/APP/7.6.4]). See also the Applicant's response to 2.10.66 above.	
2.10.69	'Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation.'	The Applicant describes its decommissioning proposals in Chapter 6 and in the Decommissioning Plan [EN010147/APP/7.6.4] . Some of the key benefits of the Project is not only the renewable energy it will produce, but the considerable enhancement it will make to the landscape with the very significant new planting proposed, but also the biodiversity gain it will achieve, increased public access and educational benefits.	
Flexibility in the project details			
2.10.70	'In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: <ul style="list-style-type: none"> the type, number and dimensions of the panels; layout and spacing; 	Details of the project parameters are set out in Chapter 6 of the ES and the Layout and Design Principles document [EN010147/APP/7.7] which set out control and delivery measures.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<ul style="list-style-type: none"> the type of inverter or transformer; and whether storage will be installed (with the option to install further panels as a substitute).' 		
2.10.71	'Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.'	Details of the project parameters are set out in Chapter 3 and 6 of the ES.	
2.10.72	'Guidance on how applicants should manage flexibility is set out at Section 2.6 of this NPS.'	Details of the project parameters are set out in Chapter 3 and 6 of the ES.	
Impacts			
Biodiversity, ecological, geological conservation and water management			
2.10.76	'The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.'	Details of the ecology assessment, impacts and mitigation are contained within Chapter 9 of the ES and in the Mitigation and Commitments schedule [EN010147/APP/6.5] .	
2.10.77	'Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.'	Relevant surveys have been undertaken.	
2.10.78	'The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.'	The Applicants has employed experienced and competent ecologists to advise on the scheme, and secure substantial BNG. In particular, Mr Guy Parker of Wychwood Ecology Ltd has worked with RPS's ecologists to bring his expertise to bear on the delivery of the BNG and management of the site based upon his recent experience with the Southill Solar Farm in Oxfordshire and Boxsted Solar Farm in Essex. Dr Peter Shepherd of BSG ecology has also been employed to bring his knowledge and expertise in respect of bat populations that	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		exist in and around the Project Site.	
2.10.79	'The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should specify mitigation to avoid or minimise these impacts, and any further surveys required.'	Details of the ecology assessment, impacts and mitigation are contained within Chapter 9 of the ES and in the Mitigation and Commitments schedule Volume 3, Appendix 6.1 [EN010147/APP/6.5] .	
2.10.80	'Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.'	A Soils Management Plan has been produced and describes how soils will be managed [EN010147/APP/7.6.1] .	
2.10.81	'Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at paragraphs 2.10.33 and 2.10.34.'	A Soils Management Plan has been produced and describes how soils will be managed [EN010147/APP/7.6.1] .	
2.10.82	'Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.'	The Applicant has considered this and lighting type, location and use will be controlled in the oCMP, the oLEMP and reflected in the Mitigation and Commitments Schedule [EN010147/APP/6.5] .	
2.10.83	'Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the	Hedgerow removal has been minimised and where removal is proposed surveys have been undertaken to describe associated impacts and effects. Substantial hedgerow planting is proposed, and the Layout and Design Principles document [EN010147/APP/7.7] references the control	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	construction and design of any fencing should account for enabling mammal, reptile and other fauna access into the site if required to do so in the ecological report.'	measures to be adopted by the Project including the buffers proposed throughout the site. The oLEMP also describes how fencing will allow for access for mammal, reptile and other fauna.	
2.10.84	'Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.'	This is included in ES Volume 3 Appendix 10.1: Flood Risk Assessment [EN010147/APP/6.5].	
2.10.85	'Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches, should be used to control any run-off where recommended.'	Access tracks are proposed and where surfacing is proposed, that will be permeable avoiding or minimising effects on surface water run-off. Any access tracks located within Flood Zone 1, 2 and 3 have been subjected to the sequential test and exception test. Where required, appropriate mitigation measures are outlined within Volume 3, Appendix 10.1: Flood risk assessment [EN010147/APP/6.5].	
2.10.86	'Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.'	The conceptual drainage strategy is presented within Appendix 10.2: Conceptual Drainage Strategy [EN010147/APP/6.5] and has been developed in accordance with 2023 NPS, NPPF, PPG ID7 the SuDS Manual and local council policy. The Conceptual drainage strategy considers existing and proposed runoff rates, the hierarchy of drainage and how SuDS can be incorporated within the proposed design.	
2.10.87	'Culverting existing watercourses/drainage ditches should be avoided.'	Culverting is not proposed by the Applicant	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.10.88	'Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.'	Culverting is not proposed by the Applicant	
2.10.89	'Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged.'	Substantial BNG is planned for the Project site – Volume 3, Appendix 9.13 [EN010147/APP/7.6.3] The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. The oLEMP [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.	
2.10.90	'For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.'	The Defra Statutory BNG Metric has been used to demonstrate net gain. It is intended that the Project will have a gain of at least 70% Habitat BNG. Full details are set out in Appendix 9.13. The oLEMP [EN010147/APP/7.6.3] will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Project.	
2.10.92	'Applicants should consider whether they need to provide geotechnical and hydrological information (such as identifying the presence of peat at each site) including the risk of landslide connected to any development work.'	Ground conditions are described in Chapter 11 of the ES and soil types are also described in Chapter 11 and 17. No peat is present. Hydrological information is contained in Chapter 10 [EN010147/APP/6.3]	
Landscape, visual and residential amenity			
2.10.94	'The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be	Chapter 8 describes the ZTV of the Project. [EN010147/APP/6.3]	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.'		
2.10.95	'However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised.'	As the design and layout of the Project evolved refinements included removing solar arrays on more exposed high ground and lowering of the panel heights have assisted in reducing the visual effects of the Project. This combined with the management of the exiting landscape structure (e.g. allowing existing hedgerow to grow up to a height to screen development) and the substantial new planting proposed is designed to provide effective screening from year 5 and beyond (see Landscape and Visual Chapter 8).	
2.10.96	'Landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre-application process.'	Notwithstanding that the Project does not fall within any National Landscape, one of the key priorities in the course of the evolution of the design and layout of the Project has been to prioritise, where possible, a landscape led approach to the development. As a result, maximum use has been made of existing landscape features when siting development, substantial new planting is proposed, and development has been stripped back from higher ground all in order to avoid or minimise adverse impacts in visual and character terms.	
2.10.97	'Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any	The landscape and heritage consultant have worked together to avoid or minimise significant adverse effects upon heritage assets and other sensitive receptors. Representative viewpoints have been chosen and photomontages produced to	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	nearby residential areas or viewpoints.'	describe visual effects of the development (refer to Chapter 7 and 8 [EN010147/APP/6.3]).	
2.10.98	'Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.'	See response above to paragraphs 2.10.96, 2.10.97 and section 4.3 of this PSS.	
2.10.99	'Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact..'	The Applicant, where possible, has placed fencing behind existing or proposed planting in order avoid to reduce adverse visual effects of fencing and other security measures.	
2.10.100	'The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.'	The Applicant has adopted a landscape led approach to the layout and design of the Project, maximising the use of existing landscape features (hedgerows, trees and woodland) when siting development, imposing appropriate buffer distances to protect existing features, proposing substantial new planting in key areas, and stripping development back from higher ground, all in order to avoid or minimise adverse impacts in visual and character terms. Individual veteran trees have also been identified and protected throughout the Project Site.	
2.10.101	'The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate.'	The Applicant has retained the vast majority of existing landscape features throughout the Project Site, with only limited hedgerow removal. Hedgerow surveys have been undertaken and effects reported within the Ecology and Landscape Chapters 9 and 8 of the ES [EN010147/APP/6.3].	

Paragraph	Details	Applicant Comments	Planning Authority Comments
Glint and glare			
2.10.102	<p>'Solar panels are specifically designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun's rays at certain angles, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.'</p>	<p>The Applicant has undertaken a Glint and Glare assessment. Mitigation measures adopted and no residual adverse effects are predicted – Volume 3, Appendix 4.4 [EN010147/APP/6.5]</p>	
Cultural Heritage			
2.10.107	<p>'The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.'</p>	<p>The Applicant has assessed above and below ground heritage assets including potential effects upon The Blenheim Palace World Heritage Site (WHS) - see Volume 3, Appendix 7.4 [EN010147/APP/6.3 and 6.5].</p> <p>No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.</p>	
2.10.109	<p>'Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.'</p>	<p>The Applicant has agreed a WSI with the County Archaeologist [EN010147/APP/7.6.5]. This includes an agreed approach of protection of underground archaeology. Positive effects are predicted as the Applicant has removed development from all identified areas of potential archaeological significance i.e. a no dig approach. In addition, where cabling crosses important areas of underground</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
		archaeology, cables will be laid on the surface to avoid damaging the asset.	
2.10.110	‘Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.’	See above response to 2.10.109.	
2.10.112	‘Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	The applicant has undertaken a desk top exercise, examining all relevant records relevant to the site, examined photographic records and undertaken extensive geophysical surveys of the site. Trial trenching is also underway, with the results of this being reported shortly after submission of the DCO in agreement with the County Archaeologist and Historic England. [EN010147/APP/7.6.5]	
2.10.113	‘Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.’	See response to 2.10.122 above. Setting of heritage assets has also been considered by the Applicant and appropriately protected by reason of distance from the receptor and/or screening. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.	
2.10.114	‘In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the	The approach to identification, evaluation and protection of heritage assets has been agreed with the County Archaeologist [EN010147/APP/7.6.5] . The	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.'	Applicant continues to work with HE in respect of the HIA study which addresses effect upon The Blenheim Palace World Heritage Site see Volume 3, Appendix 7.4 [EN010147/APP/6.5]. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.	
2.10.115	'The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area.'	The approach to identification, evaluation and protection of underground heritage assets has been agreed with the County Archaeologist [EN010147/APP/7.6.5].	
2.10.116	'Applicants should take account of the results of historic environment assessments in their design proposal.'	The Applicant has removed development away from areas identified as having potential archaeological importance. Setting of heritage assets has also been considered by the Applicant and appropriately protected by reason of distance from the receptor and/or with the introduction of landscape screening. No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.	
2.10.117	"Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.'	See response to paragraph 2.10.116 above. A WSI has also been agreed with the County Archaeologist see Volume 3, Appendix 7.4 [EN010147/APP/7.6.5].	
2.10.118	'As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale,	The Applicant has removed development away from areas identified as having potential archaeological importance. Setting of heritage assets has also been considered by the Applicant and appropriately protected by reason of distance from the	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	design, and prominence, may cause substantial harm to the significance of the asset.'	<p>receptor and/or with the introduction of landscape screening.</p> <p>The Applicant continues to work with HE in respect of the HIA study which addresses the potential effect upon The Blenheim Palace World Heritage Site [EN010147/APP/7.6.5].</p> <p>No significant effects are predicted. Substantial harm to heritage assets is also avoided and so complies with planning policy requirements.</p>	
2.10.119	'Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.'	Visualisations and cross sections have been produced by the Applicant in the HIA report [EN010147/APP/7.6.5].	
Construction including traffic and transport noise and vibration			
2.10.120	'Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the delivery and assemblage of the necessary components.'	<p>The Applicant has given detailed consideration to vehicular access requirements for construction and operation. In particular, the general approach for construction is to deliver all materials into the four main Construction Compound sites as identified on the Temporary Facilities plan [EN010147/APP/7.6.5], from which materials will be distributed as necessary throughout the wider site. Detailed consideration has also been paid to the design and layout of the accesses proposed to serve these compound areas and these details are shown at Figures [EN010147/APP/7.3.1].</p>	
2.10.121	'Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farms will derive mainly from the effects of traffic movements, which is likely to involve smaller vehicles than typical onshore energy'	<p>An assessment of the traffic and transportation effects of the development is reported in Chapter 12 of the ES. This chapter sets out the assumptions on which the assessment is based including the delivery routes to be used during the construction phase.</p> <p>No significant adverse effects are predicted.</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	infrastructure but may be more voluminous.'		
2.10.123	'Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application and select the route that is the most appropriate.'	See response to paragraph 2.10.121 above.	
2.10.124	'Where the exact location of the source of construction materials, such as crushed stone or concrete is not be known at the time of the application, applicants should assess the worst-case impact of additional vehicles on the likely potential routes.'	See response to paragraph 2.10.121 above	
2.10.125	'Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES.'	See Applicants' response to paragraph 2.10.121 above. The Works Plans and schedules within the draft DCO describe the works required for access purposes [EN010147/APP/2.3]	
2.10.126	"Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local	The Applicant has undertaken a cumulative effects assessment with other relevant development – Chapter 20 [EN010147/APP/6.3] . No significant effects are predicted.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	highways authorities is likely to be necessary.'		
Secretary of State decision making			
Factors influencing site selection and design			
Agriculture land classification and land type			
2.10.145	'The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.'	<p>The assessment of effects in respect of BMV is set out in Chapter 8 of the ES and section 4.3 of this PSS. A Soil Management Plan is proposed [EN010147/APP/7.6.1].</p> <p>Whilst some BMV is lost by the Project the areas are small and not significant in EIA terms. It is considered that on balance the benefits arising from the Project outweigh the impact upon BMV land.</p>	
Technical Considerations			
Project lifetime and decommissioning			
2.10.146	'The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable ...'	The Applicant has provided an outline Decommissioning Plan as part of the ES and DCO [EN010147/APP/7.6.4].	
2.10.147	'Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity.'	The Applicant does not wish to consent to be controlled by limitation to its generation capacity. Instead, as with other solar DCO consents (e.g. Mallard Pass, Gate Burton and Cottam), it wishes to secure consent by reference to when decommissioning is to start. As such Requirement 15 of the draft Order states that decommissioning of the authorised development must commence no later than 37.5 years following the date of final commissioning.	
2.10.148	'Such a requirement should also secure the	The Applicant has prepared a Decommissioning Plan which is	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life.'	secured by Requirement [EN010147/APP/7.6.4].	
2.10.149	'An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.'	The Applicant seeks a temporary consent for the development – see response to paragraph 2.10.147 above.	
2.10.150	'The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.'	The Applicant seeks a temporary consent for the development – see response to paragraph 2.10.147 above.	
2.10.151	'The Secretary of State should consider the period of time the applicant is seeking to operate the generating station, as well as the extent to which the site will return to its original state, when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.'	Noted. The Applicant considers these effects within relevant chapters of the ES, and in the conclusion on the planning balance at section 4.0 of this PSS.	
Impacts			
2.10.152	'The impacts identified in Part 5 of EN-1 and below, are not intended to be exhaustive.'	Noted.	
2.10.153	'The Secretary of State should consider any impacts which it determines are relevant and important to its decision.'	Noted. The Applicant believes it has assessed all relevant impacts to allow a decision to be made.	
Biodiversity, ecological, geological conservation and water management			
2.10.154	'Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural	The Applicant has sought to optimise the environmental advantages of the development, and incorporates significant BNG and this, together with other environmental improvements, are set out in	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.'	the oLEMP. Of note is the ability of the Applicant to manage the Evenlode corridor to bring that area into a more favourable conservation status, and the proposal to create a water attenuation feature and associated bunding designed to avoid or reduce flooding that has historically occurred in the village of Cassington.	
2.10.155	'The Secretary of State must consider the worst-case effects in its consideration of the application and consent.'	The Applicant has assessed the likely worst case effects arising from the development (see Chapter 4 of the ES, Approach to Assessment).	
2.10.156	Where developments are proposed on peat, to ensure the development will result in minimal disruption to the ecology, or release of CO2, and that the carbon balance savings of the scheme are maximised, the Secretary of State should be satisfied that the solar farm layout and construction methods have been designed to minimise soil disturbance during construction and maintenance of roads, tracks, and other infrastructure and in England should take into account the policies set out in the England Peat Action Plan 2021'	No peat is present on the Project Site.	
Landscape, visual and residential amenity			
2.10.157	'The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks, The Broads and Areas of	Adverse landscape and visual effects of the development have been avoided or minimised as a result of continuous refinements to the Project layout and design. Relevant environmental effects and mitigation measures are set out with the Landscape and Visual Effects Chapter of the ES, in the Layout and Design Principles Document [EN010147/APP/7.7], and in the Mitigations and	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Outstanding Beauty) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.'	<p>Commitment Schedule [EN010147/APP/6.5].</p> <p>Whilst some short term some adverse effects are predicted during construction and in Year 1 in winter, these effects diminish and are avoided after year 5. Overall, the site is capable of absorbing the development without giving rise to unacceptable adverse effects.</p> <p>The effects of the solar farm are temporary and reversible and will ultimately lead to a significant biodiversity and landscape enhancement of the area.</p>	
Glint and glare			
2.10.158	'Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).'	The Applicant has undertaken a Glint and Glare Assessment and no significant adverse effects have been found – Volume 3, Appendix 4.4 [EN010147/APP/7.6.5].	
2.10.159	'Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms.'	See response to paragraph 2.10.158 above.	
Cultural Heritage			
2.10.60	'Solar farms are generally consented on the basis that	The Applicant seeks a temporary consent and reports	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.'	upon relevant effects within all topic chapters in the ES (e.g. Chapter 7, Historic Environment [EN010147/APP/6.3]). No adverse effects are predicted, and some beneficial effects are expected.	
Construction including traffic and transport noise and vibration			
2.10.161	'Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.'	The assumptions underpinning the Traffic and Transportation effects are set out within Chapter 12 [EN010147/APP/6.3] of the ES and relevant appendices within Volume 3, Appendix 12 [EN010147/APP/6.5]	
2.10.162	'The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.'	In respect of traffic and transportation effects there will be no significant effects arising from the Project during the construction, operation and maintenance or decommissioning phases.	

Appendix D

NPS EN-5 Compliance Table

National Policy Statement for Electricity Works Infrastructure (NPS EN-5)

Key Paragraphs (As submitted November 2024)

Paragraph	Details	Applicant Comments	Planning Authority Comments
Assessment and Technology-Specific Information			
Introduction			
2.1.4	‘Decommissioning of electricity networks is not specifically covered in this NPS. Generally, nationally significant electricity networks are likely to have an ongoing function, but will be subject to maintenance, reinforcement works and for assets to be replaced when they come to the end of their lifespan.’	Noted. The Applicant has prepared a Decommissioning Plan for the Project [EN010147/APP/7.6.4] . It assumes that the NGET substation will remain in situ once consented and commissioned.	
2.1.5	‘As stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure’	Noted. The Applicant is proposing associated electrical infrastructure to enable connection to the NGET substation; this infrastructure will attract CNP status in policy terms.	
Factors influencing site selection and design			
2.2.1	‘The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.’	In the case of the Botley West solar farm, the Applicant intends to secure consent for a new NGET substation within its Order Limits. The subsequent consent will be transferred to NGET to build out and commission [EN010147/APP/3.1] .	
2.2.2	‘Siting is determined by: <ul style="list-style-type: none"> the location of new generating stations or other 	NGET have chosen to develop and commission a new 400kV substation to serve the Botley West solar farm and other renewable	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<p>infrastructure requiring connection to the network, and/or</p> <ul style="list-style-type: none"> • system capacity and resilience requirements determined by the Electricity System Operator.' 	<p>generation developments emerging nearby. The location is assumed to be within the Applicants Order Limits within its Southern Site area. The Applicant is aware however, that NGET is also pursuing the possibility of securing consent for its new substation on land immediately to the west of the Applicants Southern Site. or possibly immediately to the west, both being in close proximity of the existing 400kV overhead line. The approach to assessment of the NGET substation is set out in Chapter 6 of the ES. In the event that NGET delivered on land to the west, the Applicant has assessed that scenario cumulatively.</p> <p>Siting of the NGET substation was influential in the selection of the Project Site.</p>	
2.2.3	<p>'These twin constraints, coupled with the government's legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries' and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date.'</p>	<p>This is noted and understood by the Applicant.</p>	
2.2.4	<p>'However, a strategic and holistic approach to onshore and offshore network planning, as set out in paragraphs 2.7 – 2.8, will identify the most efficient way of meeting decarbonisation targets and should reduce the</p>	<p>This is noted by the Applicant, but the NGET 400kV substation is CNP infrastructure and is vital to deliver the Botley West Project as well as other energy generating and storage scheme nearby.</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	overall amount of network infrastructure required.'		
2.2.5	'Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone.'	<p>The availability and provision of the new NGET substation was one of a number of factors that influenced the Applicants' site selection (see Chapter 5, Alternatives).</p> <p>The provision of the connecting electrical cables largely follow the public highway. There are four locations where alternative cable routes are possible and being evaluated (see Chapter 5 and 6 in the ES for details).</p>	
2.2.6	'Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in sections 2.4-2.9.'	The site selection and cable route choice and influences upon both are described in detail in Chapter 5 and 6 of the ES.	
2.2.7	'The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.'	The site selection and cable route choice and influences upon both are described in detail in Chapter 5 and 6 of the ES.	
2.2.8	'There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.'	The siting of the Applicants electrical infrastructure has sought to avoid or minimise any adverse effects, including from visual or from a noise perspective. Design of above ground infrastructure will be the subject of approval from the relevant local planning authority.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
2.2.9	‘In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)’	Relevant mitigation measures are described in the Mitigation and Commitments Schedule – Volume,3 Appendix 6.1 [EN010147/APP/6.5].	
2.2.10	‘As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.”’	The Applicant has taken into account the duties associated with Schedule 9 of the Electricity Act 1989.	
2.2.12	‘Transmission and distribution licence holders are also required under	The Applicant has produced a statement to address Schedule 9 of the Electricity	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Schedule 9 to the Electricity Act 1989 to produce and publish a statement setting out how they propose to perform this duty generally.'	Act 1989 [EN010147/APP/1.1].	
Climate Change Adaption and Resilience			
2.3.2	<p>'As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to:</p> <ul style="list-style-type: none"> • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables 	<p>Climate change effects are assessed with the Climate Change Chapter no.14 within the ES. [EN010147/APP/6.3].</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	and their associated substations in the inshore and coastal locations respectively.'		
2.33	'Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Sections 5.8 in EN-1). Consideration should also be given to coastal change (see sections 5.6 in EN1).'	Climate change effects are assessed with the Climate Change Chapter no.14 within the ES. [EN010147/APP/6.3].	
Consideration of good design for energy infrastructure			
2.4.3	'However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.'	Subject to safety and engineering requirements, the design of above ground electrical infrastructure will be the subject of detail approval by the relevant planning authority via Requirements in the DCO.	
2.4.4.	'While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Sections 2.9 below) – the functional	Noted. See Applicant response to 2.4.3 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.'		
Environmental and Biodiversity Net Gain			
2.5.1	<p>'When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:</p> <ul style="list-style-type: none"> i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.' 	<p>The Applicant has achieved significant BNG (refer to oLEMP and BNG Report at [EN010147/APP/7.6.3] and Volume 3, Appendix 9.13 [EN010147/APP/6.5], and is able to deliver other benefits including increased public access to the site (refer to Landscape, Ecology and Amenities Plan, [EN010147/APP/7.3.3]).</p>	
Land Rights and Land Interests			
2.6.1	<p>'In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or</p>	<p>Land ownership and rights are reported within the Book of reference [EN010147/APP/4.3]</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	enhancement schemes, applicants must: i. own the land on, over, or under which the relevant activity is to take place; or ii. hold sufficient rights over or interests in that land (typically in the form of an easement); or iii. have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave).'		
2.6.2	'Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work.'	Voluntary agreements have been sought throughout the Project area. For details on see Book of reference [EN010147/APP/4.3] and Land and Rights Negotiations Tracker [EN010147/APP/3.6]	
2.6.3	'As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO.'	Voluntary agreements have been sought throughout the Project area. For details on see Book of reference [EN010147/APP/4.3] and Land and Rights Negotiations Tracker [EN010147/APP/3.6] . Compulsory powers sought are set out in the draft DCO [EN010147/APP/3.1]	
2.6.5	'The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.'	The compulsory powers sought are set out in the draft DCO [EN010147/APP/3.1]	
2.6.6	As detailed in Section 4.1.8 of EN-1, where	The compulsory powers sought are set out in the draft DCO [EN010147/APP/3.1]	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance		
Applicant Assessment			
Biodiversity and Geological Conservation			
2.9.3	‘Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure.’	No overhead lines are proposed by the Applicant. The NGET substation has been deliberately sited close to the existing 400kV line to reduce costs of connection to the national grid network and limit any adverse visual or other effects that might otherwise arise if the overhead connection was required.	
2.9.6	‘Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the ‘national site network’ provisions of the	The Applicant has considered impacts upon feeding and hunting grounds, migration corridors and breeding grounds where relevant within Chapter 9 of the ES. [EN010147/APP/6.3]	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Conservation of Habitats and Species Regulations.'		
Landscape and Visual Impact			
2.9.7	'While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.'	See response to paragraph 2.9.3 above. No overhead lines are proposed by the Applicant. The landscape and visual effects of the substations and other development are assessed with Chapter 8 in the ES. [EN010147/APP/6.3]	
2.9.8	'These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed.'	See Applicants response to paragraph 2.9.7 above.	
2.9.9	'New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.'	See Applicants response to paragraph 2.9.7 above.	
2.9.10	'Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with	See Applicants response to paragraph 2.9.7 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	other related developments such as substations, wind farms, and/or other new sources of generation.'		
2.9.11	'Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines.'	See Applicants response to paragraph 2.9.7 above.	
2.9.12	'However, in nationally designated landscapes (for instance, National Parks, The Broads and Areas of Outstanding Natural Beauty) even residual impacts may well make an overhead line proposal unacceptable in planning terms. (See Section 2.9.20 below for guidance on this case.)'	The Project is not located within any nationally designated landscape.	
2.9.13	'Where possible, applicants should ensure that the principles detailed in Sections 2.11.16-2.11.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also offer proposals (for instance those detailed in Section 2.10 below)	See Applicants response to paragraph 2.9.7 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	for additional mitigation.'		
Undergrounding and subsea cables			
2.9.20	'Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty).'	Noted. All cables are laid underground or, in limited areas, on the surface where significant archaeology has been identified. As a result no significant adverse visual or other environmental effects are predicted.	
2.9.21	'In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by re-routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line.'	See Applicants response to paragraph 2.9.20.	
2.9.22	'However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These	See Applicants response to paragraph 2.9.20.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme.'		
2.9.23	<p>'Additionally, cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling.'</p>	See Applicants response to paragraph 2.9.20.	
2.9.24	<ul style="list-style-type: none"> • 'In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against: • the adverse implications of the overhead line proposal; • the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and • the cost and feasibility of the 	Noted. See Applicants response to paragraph 2.9.20.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure.'		
2.9.25	<p>In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider:</p> <ul style="list-style-type: none"> the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, 	Noted. See Applicants response to paragraph 2.9.20.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<p>where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 section 5.4.53 on regional and local designations;</p> <ul style="list-style-type: none"> the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating; the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating); the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of 		

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<p>seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment;</p> <ul style="list-style-type: none"> the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and 		

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<p>return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.'</p>		
2.9.25	<p>In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider:</p> <ul style="list-style-type: none"> the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's 	<p>Noted. See Applicants response to paragraph 2.9.20.</p>	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<p>Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 section 5.4.53 on regional and local designations;</p> <ul style="list-style-type: none"> the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating; the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would 		

Paragraph	Details	Applicant Comments	Planning Authority Comments
	<p>an overhead line of equivalent rating);</p> <ul style="list-style-type: none"> the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment; the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, 		

Paragraph	Details	Applicant Comments	Planning Authority Comments
	including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.'		
Noise and Vibration			
2.9.26	'All high voltage transmission lines have the potential to generate noise under certain conditions.'	Noise and vibration are assessed where relevant within the Chapter 13, Noise and Vibration. No significant adverse effects are predicted to arise. Mitigation measures are set out within the Mitigation and Commitments schedule – Volume 3, Appendix 6.1 [EN010147/APP/6.5]	
2.9.27	'Line noise is most commonly caused by corona noise when the conductor surface electric stress exceeds the inception level for corona discharge activity which is released as acoustic energy and radiates into the air as sound. Transmission line conductors are normally	See Applicant response to paragraph 2.9.26 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	designed to operate below this threshold.'		
2.9.28	'Surface contamination on a conductor or accidental damage during transport or installation can cause local enhancement of electric stress and initiate discharge activity leading to the generation of additional noise.'	See Applicant response to paragraph 2.9.26 above.	
2.9.34	'Transmission line audible noise is generally categorised as 'crackle' or 'hum', according to its tonal content.'	See Applicant response to paragraph 2.9.26 above.	
2.9.37	'Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.'	See Applicant response to paragraph 2.9.26 above.	
2.9.38	'Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).'	See Applicant response to paragraph 2.9.26 above.	
2.9.39	'For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards ²⁵ are satisfactory.'	See Applicant response to paragraph 2.9.26 above.	
2.9.40	"For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and	See Applicant response to paragraph 2.9.26 above.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	wet weather conditions, in addition to assessing the impact on noise-sensitive receptors.'		
Electric and Magnetic Fields (EMFs)			
2.9.44 to 2.9.58	Health effects of EMF's'	Chapter 16: Human Health in Volume 1 of the ES [EN010147/APP/6.3] considers public understanding of EMF exposure in terms of mental health outcomes associated with concern, acknowledging that actual risks are unlikely to be significant for public health (see section 16.9 of the Chapter).	
Sulphur Hexafluoride			
2.9.59	'Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.'	Noted	
2.9.60	'It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050.'	Noted	
2.9.61	'Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.'	The Applicant will seek to avoid the use of SF6-reliant assets.	
Secretary of State decision making			
Impacts Biodiversity and Geological conservation			
2.11.1	'Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied	The Applicant has assessed the effects upon flora and fauna arising from electrical infrastructure within Chapter 9, Ecology. [EN010147/APP/6.3] No	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	that all feasible options for mitigation have been considered and evaluated appropriately.'	significant adverse effects are predicted to arise.	
Landscape and Visual			
2.11.2	'The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them.'	No Overhead lines are proposed. The Applicant has assessed the landscape and visual effects arising from electrical infrastructure within Chapter 8, Landscape and Visual Effects. [EN010147/APP/6.3] No significant adverse effects are predicted to arise.	
2.11.3	'The Secretary of State should also be satisfied that all feasible options for mitigation – including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately.'	Noted. No Overhead lines are proposed. The Applicant has refined the layout and design of the Project to avoid or minimise adverse environmental effects. This approach is described in Chapter 5 in the ES, in the Layout and Design Principles document [EN010147/APP/7.7] , and the Mitigations and Commitments Schedule – Volume 3, Appendix 6.1 [EN010147/APP/6.5] .	
2.11.4	'In circumstances where it can be demonstrated that a mitigation measure and/ or technological approach is appropriate and/ or necessary for a project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making.'	See Applicant response to paragraph 2.11.3 above.	
2.11.5	'Nationally designated landscapes have specific statutory purposes which help ensure their continued protection. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines	The Project does not fall within and nationally designated landscapes.	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	should be reversed to favour undergrounding.'		
Noise and vibration			
2.11.7	'The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant.'	Noted. Noise effects have been assessed within Chapter 13 in the ES. [EN010147/APP/6.3] Mitigation measures are set out within the Mitigation and Commitments Schedule Volume 3, Appendix 6.1 [EN010147/APP/6.5] . No significant effects are predicted to arise.	
2.11.8	Consequently, noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable'	See Applicant response to paragraph 2.11.7 above.	
Electric and Magnetic Fields (EMFs)			
2.11.9	'This NPS does not repeat the detail of the ICNIRP 1998 guidelines on restrictions or reference levels. The government has developed with the electricity industry a Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice', published in February 2011 that specifies the evidence acceptable to show compliance with ICNIRP 1998 guidelines and is also in line with the terms of the 1999 EU Council	Chapter 16: Human Health in Volume 1 of the ES [EN010147/APP/6.3] considers public understanding of EMF exposure in terms of mental health outcomes associated with concern, acknowledging that actual risks are unlikely to be significant for public health (see section 16.9 of the Chapter).	

Paragraph	Details	Applicant Comments	Planning Authority Comments
	Recommendation on EMF exposure.'		
Sulphur Hexafluoride			
2.11.17	<p>'The Secretary of State should grant consent for an electricity networks development only if the applicant has demonstrated either:</p> <p>i. that the development will not use SF6; or</p> <p>ii. (a) that there is no proven commercially available alternative to the use of SF6; and</p> <p>(b) that a bespoke SF6-free alternative would be grossly disproportionate in terms of cost; and</p> <p>(c) that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.'</p>	The Applicant will consider the use of SF6 and SF6 free alternatives in the detailed design work.	

Appendix E

NPPF Compliance Table

NPPF 2023 Paragraphs (As submitted November 2024)

Section/Paragraph Number	Description	Comment	Planning Authority Comment
Section 2 – Achieving Sustainable Development			
Paragraph 10	Provides that for sustainable development to be pursued positively, at the heart of the NPPF, is a presumption in favour of sustainable development.	<p>The Project has been designed and laid out, and is subject to a number of mitigation measures, which together deliver sustainable development.</p> <p>The Project successfully delivers a vital contribution to the Governments solar targets and Net Zero obligations, significant BNG, and will leave a significant and positive landscape and biodiversity legacy in the region for the long term (see the oCoCP and oOMP [EN010147/APP/7.6.1 and 7.6.2], the oLEMP [EN010147/APP/7.6.3], the Landscape, Ecology and Amenities Area plan [EN010147/APP/7.3.3] and the Mitigation and Commitments schedule [EN010147/APP/6.5].</p>	
Paragraph 11	<p>Sets out the presumption in favour of sustainable development, which for decision-taking means:</p> <p><i>“c) approving development proposals that accord with an up-to-date development plan without delay; or</i></p> <p><i>d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:</i></p> <p><i>i. the application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed; or</i></p>	<p>Section 2 of this PSS sets out the decision making process the Secretary of State will follow in respect of NSIP's.</p> <p>The National Planning Policy Framework (NPPF) and the Planning Practice Guidance, for England, has been taken into account within the energy NPSS where appropriate (Paragraph 4.1.11)</p> <p>To the extent paragraph 11 is relevant, the Project accords with its provisions.</p>	

Section/Paragraph Number	Description	Comment	Planning Authority Comment
	<p><i>ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."</i></p>		
Section 11 – Making effective use of land			
Paragraph 124	Identifies how planning policies and decisions should encourage multiple benefits from both urban and rural land and take opportunities to achieve net environmental gains such as developments that, amongst other things, would enable new habitat creation.	The Project has evolved in a way that positively balances the impacts associated with development at scale in countryside locations, with the very significant benefits the Project will bring. Importantly, the Project is regarded by Government as being a CNP, providing as it does a vital contribution to the delivery of the Governments solar targets ; making a positive contribution to its Net Zero obligations and its BNG goals, and also by helping to positively address the Climate Change Emergencies that the host authorities have declared.	
Section 13 – Protecting Green Belt land			
Paragraph 142	Provides that the fundamental aim of Green Belt policy is to <i>"prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."</i>	<p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS (Appendix 8). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	
Paragraph 143	<p>Provides the five purposes of a Green Belt, which are:</p> <p><i>a) The check the unrestricted sprawl of large built-up areas;</i></p> <p><i>b) To prevent neighbouring towns merging into one another;</i></p> <p><i>c) To assist in safeguarding the countryside from encroachment;</i></p>	<p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS Appendix 8). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point</p>	

Section/Paragraph Number	Description	Comment	Planning Authority Comment
	<p>d) <i>To preserve the setting and special character of historic towns; and</i></p> <p>e) <i>To assist in urban regenerations, by encouraging the recycling of derelict and other urban land."</i></p>	that CNP Infrastructure will meet the VSC case.	
Paragraph 152	Details that <i>"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."</i>	<p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	
Paragraph 153	Highlights that local planning authorities, when considering a planning application, should ensure that <i>"substantial weight is given to any harm to the Green Belt."</i> It continues that <i>"Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."</i>	<p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	
Paragraph 154	Details that where development in the Green Belt is not considered inappropriate development, which range from, inter alia, agricultural buildings, provision for outdoor sport and creation to limiting infilling in villages.	The Applicant considers that the provision of electrical cables and related works (see Appendix 8 for details in this PSS) comprise engineering operations directly associated with the Project is not inappropriate development in Green Belt terms.	
Paragraph 155	The forms of development detailed are also not considered to be inappropriate development in the Green Belt, providing they preserve its openness	The Applicant considers that the provision of electrical cables and related works (see Appendix 8 for details in this PSS) comprise engineering operations directly associated	

Section/Paragraph Number	Description	Comment	Planning Authority Comment
	and do not conflict with the purposes of including land within the Green Belt, including engineering operations.	<p>with the Project is not inappropriate development in Green Belt terms.</p> <p>The wider VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	
Paragraph 156	In specific relation to renewable energy developments; <i>“When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”</i>	<p>The Applicant’s VSC case supports the project being allowed in this location. Details of the Green Belt assessment are set out in Appendix 8 of this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	
Section 14 – Meeting the challenge of climate change, flooding and coastal change			
Paragraph 157	States <i>“The planning system should support the transition to a low carbon future in a changing climate ... It should help to: shapes places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; and support renewable and low carbon energy and associated infrastructure.”</i>	<p>Climate Change effects are set out within Chapter 14 of the ES. Significant beneficial effects from the Botley West Solar Farm are predicted.</p> <p>The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.</p>	
Paragraph 160	Seeks to help increase the supply of renewable and	Whilst the host authorities have not expressly allocated land for	

Section/Paragraph Number	Description	Comment	Planning Authority Comment
	low carbon energy and heat through the plan-making process via positive strategies which maximise the potential for suitable development, future re-powering and life extension, whilst ensuring adverse impacts are addressed, including cumulative landscape and visual impacts.	renewable energy development, all have policies which support in principle renewable energy development. The Applicant considers the Project complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.	
Paragraph 163	Does not require applicants to demonstrate the overall need for renewable or low carbon energy, in planning applications, and for local planning authorities to approve applications where its impacts are, or can be made, acceptable.	The Applicant notes and welcomes the position on need.	

Appendix F

VoWH District Council & Oxfordshire County Policy Compliance Tables

Relevant planning policies of the VoWH Local Plan 2031 Part 1 and 2 (As submitted November 2024)

Policy	Description	Applicant Comment	Local Authority Comment
Core Policy 13 – The Oxford Green Belt	The Oxford Green Belt will continue to be protected to maintain its openness and permanence. Inappropriate development will not be approved except in very special circumstances. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	
Core Policy 33 – Promoting Sustainable Transport and Accessibility	The Council will work with OCC and others to, <i>inter alia</i> , actively seek to ensure that the impacts of new development on the strategic and local road network are minimised.	Chapter 12 [EN010147/APP/6.3] assess the effect of the Project on the highway network. No adverse effects are predicted. The Project complies with Core Policy 33.	
Core Policy 35 – Promoting Public Transport, Cycling and Walking	The Council will work with OCC and others to, <i>inter alia</i> , seek to support the provision of new cycling routes where proposals are consistent with other plan policies.	The Project provides a new cycle route south of Bladon. The Project complies with Core Policy 35.	
Core Policy 39 – The Historic Environment	The Council will collaborate with others to ensure new development conserves and where possible enhances designated and non-designated heritage assets, and their setting, in accordance with national legislation and guidance.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant effects are predicted. In Planning terms there is no substantial harm arising and therefore is substantially in accordance with Core Policy 39.	
Core Policy 41 – Renewable Energy	The Council encourages schemes for renewable and low carbon energy	Whilst some limited adverse effects will arise, the benefits of the Project are considered	

Policy	Description	Applicant Comment	Local Authority Comment
	generation. Planning applications for renewable and low carbon energy generation (excluding wind energy) will be supported, provided that they do not cause significant adverse effects.	to clearly outweigh these and thus it complies with Core Policy 41. The Project represents a unique opportunity to secure critical national infrastructure in the form of renewable solar energy. It is also able to contribute at scale to the resolution of the Climate Change Emergency declared by the authority.	
Core Policy 42 – Flood Risk	The risk and impact of flooding will be minimised by sensitively locating developments, managing flood risk and by not increasing the risk of flooding elsewhere.	Flood risk is addressed within Chapter 10 of the ES [EN010147/APP/6.3]. A flood Risk assessment has been undertaken amongst other assessments. No adverse effects are predicted during construction, operation or the decommissioning phases of the Project. The Project complies with Core Policy 42.	
Core Policy 43 – Natural Resources	Developers are encouraged to make provision for the effective use of natural resources where applicable, including but not limited to avoiding the development of the best and most versatile agricultural land, unless it is demonstrated to be the most sustainable choice from reasonable alternatives, by first using areas of poorer quality land in preference to that or a higher quality.	Chapter 18 in the ES assesses waste and natural resources. Waste minimisation measures will be adopted as part of the oCoCP, oOMP and Decommissioning Plan. In terms of BMV, the Project will lead to a small loss of BMV land (refer to Chapter 17 in the ES – a permanent loss of approx. 5.5ha). Approximately 3.8ha of that loss relates to the positioning of the NGET substation. This is sited to be close to the adjacent 400kV lines and adjacent to the Applicant main substation. No better alternative siting could be established by the Applicant within the DCO Order Limits. The overall loss of BMV land is not considered to be significant in EIA terms or policy terms. The Project is substantially in accordance with Core Policy 43.	

Policy	Description	Applicant Comment	Local Authority Comment
Core Policy 44 – Landscape	The key features that contribute to the nature and quality of the VoWH District's landscape will be protected from harmful development and where possible enhanced.	<p>Chapter 8 of the ES considers effects upon the landscape.</p> <p>The Project will affect landscape character as it introduces a form of development that is not currently common in the landscape. Limited adverse effects cannot be avoided, but these effects have been minimised by following key layout and design principles. The Layout and Design Principles document [EN010147/APP/7.7] provides for buffers between existing settlements and the solar arrays, buffers to protect trees hedgerows and woodland. These measures together with the significant new landscaping proposed, assist in reducing adverse visual effects and effect upon landscape character.</p> <p>One decommissioned, the project will leave an important and significant landscape legacy, resulting in a significant enhancement of the area (see Landscape, Ecology and Amenities Areas plan [EN010147/APP7.3.3]</p> <p>On balance the Project is considered to comply with Core Policy 44.</p>	
Core Policy 45 – Green Infrastructure	A net gain in Green Infrastructure, including biodiversity, will be sought wither through on-site provision or off-site contributions, and the targeted use of other funding sources. A net loss of Green Infrastructure, including biodiversity, through development proposals, will be resisted.	<p>Chapter 8 and 9 deal with landscape and ecology issues respectively.</p> <p>The Project presents a unique opportunity for the planning authority to secure significant BNG and landscape enhancements. This will be achieved by retaining an agricultural use beneath the solar arrays and on other undeveloped land, and by managing it in a way to deliver significant BNG. Significant new landscaping proposals also form part of the Project. Details are set</p>	

Policy	Description	Applicant Comment	Local Authority Comment
		<p>out within the oLEMP [EN010147/APP/7.6.3] and BNG Report in Volume 3, Appendix 9.13 [EN010147/APP/6.5] and the Landscape, Ecology and Amenities Plan [EN010147/APP/7.3.3].</p> <p>The Project complies with Core Policy 45.</p>	
Core Policy 46 – Conservation and Improvement of Biodiversity	<p>Development that will conserve, restore and enhance biodiversity will be permitted. Opportunities for biodiversity gain, including the connection of sites, large-scale habitat restoration, enhancement and habitat re-creation will be actively sought, with a primary focus on delivery in the Conservation Target Areas. A net loss of biodiversity will be avoided.</p>	<p>The Project presents a unique opportunity for the planning authority to secure significant BNG. This will be achieved by retaining an agricultural use beneath the solar arrays and on other undeveloped land, and by managing the land in a way to deliver significant BNG. Details are set out within the oLEMP [EN010147/APP/7.6.3] and BNG Report –\nvolume 3, Appendix 9.13 [EN010147/APP/6.5]</p> <p>The Project complies with Core Policy 46.</p>	
Local Plan 2031 Part 2			
Core Policy 13a – Oxford Green Belt	<p>The Green Belt Boundary is amended however the approach to development within the Oxford Green Belt is set out in Core Policy 12 (Local Plan 2031: Part 1)</p>	<p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	
Development Policy 21 – External Lighting	<p>Sets out measures to ensure development involving external lighting is appropriately designed and located.</p>	<p>A lighting scheme will be prepared to support security measures for key infrastructure. The scheme will be delivered through the oOMP [EN010147/APP/7.6.2] and via a Requirement within the DCO.</p>	

Policy	Description	Applicant Comment	Local Authority Comment
Development Policy 23 – Impact of Development on Amenity	Proposals should demonstrate they will not result in significant adverse impacts on the amenity of neighbouring uses, individually and when considered cumulatively.	Chapter 5 of the ES, Alternatives, describes the design evolution of the Project and how from the outset, measures were introduced to avoid or minimise potential for significant adverse effects upon amenity (see Layout and Design Principles document [EN010147/APP/7.7] , Mitigation Measures and Commitments Schedule, Volume 3, Appendix 6.1 [EN010147/APP/6.5] and the oCoCP [EN010147/APP/7.6.1] . The Project complies with development Policy 23.	
Development Policy 25 – Noise Pollution	Seeks to ensure new development is acceptable in relation to noise pollution.	Chapter 13 in the ES, Noise, deals with potential effects arising from noise. No significant effects are predicted. The Project complies with Development Policy 25.	
Development Policy 26 – Air Quality	Seeks to ensure new development is adequately considers air quality.	Chapter 19 in the ES, Air Quality, deals with effects relating to air quality. No significant effects are predicted. The Project complies with Development Plan Policy 26.	
Development Policy 27 – Watercourses	Seeks to ensure watercourses are accommodated appropriately within new development.	Chapter 10, Hydrology and Flood Risk, reports on potential impacts upon watercourses.	
Development Policy 31 – Protection of Public Rights of Way, National Trails and Open Access Areas	Seeks to support improvements to the Public Rights of Way Network and Open Access Areas, and to protect National Trails.	Chapter 17, Agriculture Land Use and Public Rights of Way describes the Projects proposals in respect of Public Rights of Way and access. Chapter 16 on Human Health also reports on access issues [EN010147/APP/6.3] . New permissive paths are proposed alongside improvements to existing rights of way (see landscape	

Policy	Description	Applicant Comment	Local Authority Comment
		ecology and Amenities Area Plan [EN010147/APP/7.3.3]). The Project complies with Development Policy 31.	
Development Policy 36 – Heritage Assets	New development that may affect designated and non-designated heritage assets is required to demonstrate that it conserves and enhances the special interest or significance of the heritage assets and its setting in accordance with Core Policy 39. Harm to or loss of the significance of a designated heritage asset will require clear and convincing justification.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted. In planning policy terms, the project complies with Development Policy 36.	
Development Policy 37 – Conservation Areas	Requires development within or affecting the setting of a Conservation Area to demonstrate that it will conserve or enhance its special interest, character, setting and appearance.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted. In planning policy terms, the project complies with Development Policy 37.	
Development Policy 39 – Archaeology and Scheduled Monuments	Seeks for development to not have a detrimental impact on the site of or setting of nationally important designated or non-designated archaeological remains or Scheduled Monuments.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted. In planning policy terms, the project complies with Development Policy 39.	

Cumnor Neighbourhood Development Plan relevant policies (As submitted November 2024)

Policy	Description	Comment	Local Authority Comment
Policy DBC2 – Cumnor Conservation Area	Development proposals within the Conservation Area and its setting should preserve or enhance its significance as a designated heritage asset.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted.	

Policy	Description	Comment	Local Authority Comment
		In planning policy terms, the project complies with Policy DBC2.	
Policy DBC4 – Development in the Green Belt	The Green Belt will continue to be protected to maintain its openness and permeance; development in the Green Belt will be determined against VOWH Local Plan Part 1 Core Policy 13. Inappropriate development will not be supported except in very special circumstances.	<p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	
Policy DBC6 – Conserving and Enhancing Local Heritage Assets	The Neighbourhood Plan has identified Local Heritage Assets and the effect which development would have on the significance of these assets should be taken into account in planning applications.	<p>The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted.</p> <p>In planning policy terms, the project complies with Policy DBC6.</p>	
Policy DBC7 – Important Views	The Neighbourhood Plan identifies Important Views as contributing to the essential rural character of the Parish. Developments should preserve, or where practicable enhance, the local character of the landscape and should take account of the important views identified. Development which would have an unacceptable impact on the local character of the landscape and/or on an identified important view will not be supported.	<p>Chapter 8 of the ES considers effects upon the landscape.</p> <p>[EN010147/APP/6.3]</p> <p>The Project will affect landscape character as it introduces a form of development that is not currently common in the landscape. Limited adverse effects cannot be avoided, but these effects have been minimised by following key layout and design principles. The Layout and Design Principles document [EN010147/APP/7.7] provides for buffers between existing settlements and the solar arrays, buffers to protect trees hedgerows and woodland. These measures together with the significant new landscaping proposed, assist in reducing adverse visual effects and effect upon landscape character.</p>	

Policy	Description	Comment	Local Authority Comment
		One decommissioned, the project will leave an important and significant landscape legacy, resulting in a significant enhancement of the area (see Landscape, Ecology and Amenities Areas plan [EN010147/APP/7.3.3]	
Policy RNE1 – Green Infrastructure	<p>Proposals should protect, and where practicable enhance, valued landscapes, sites of biodiversity or geological value and soils in a manner commensurate with their statutory status or identified quality in the development plan, and minimise impacts on, and providing net gains for, biodiversity where practicable. Particular account should be taken of:</p> <ul style="list-style-type: none"> • Local footpaths • Trees and Hedgerows • The Hurst on Cumnor Hill, Spring Farm and Wytham Woods SSSIs. • Designated Ancient Woodlands, Priority Habitats and Priority Species • Chawley, Smith Hill Copse, Long Leys Farm Meadows, Long Copse, Footpath at Chawley, Thanks Island west of Farmoor, Farmoor Reservoir and Swinford Meadow LWSs. • Common land and village greens. <p>Proposals should maintain and enhance existing on-site biodiversity assets and provide for wildlife needs on site where practicable. On-site biodiversity</p>	<p>Chapter 8 and 9 deal with landscape and ecology issues respectively.</p> <p>The Project presents a unique opportunity for the planning authority to secure significant BNG and landscape enhancements. This will be achieved by retaining an agricultural use beneath the solar arrays and on other undeveloped land, but managing it in a way to deliver significant BNG. Significant new landscaping proposals also form part of the Project, building upon the existing landscape structure of the area.</p> <p>Details are included within the oLEMP [EN010147/APP/7.6.3] and BNG Report – Volume 3, Appendix 9.13 [EN010147/APP/6.5], and the Landscape, Ecology and Amenities Area plan [EN010147/APP/7.3.3].</p> <p>The Project complies with Policy RNE1.</p>	

Policy	Description	Comment	Local Authority Comment
	enhancements will be supported as will proposals that provide wildlife corridors allowing wildlife to move from one area of habitat to another.		
Policy RNE2 – Flood Risk	<p>Development proposals should be located and designed to take account of flood risk, with particular attention given to potential flood risk impacts in Farmoor (as shown on maps 14 and 15), Cumnor Hill (as shown on map 15) and Dean Court area (as shown on map 15).</p> <p>Unless the exception tests in paragraph 159 of the NPPF are met, inappropriate developments in areas at risk of flooding will not be supported. If development in such areas is required, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>There should be no unacceptable increase in surface water discharge off site with proposals taking account of impacts in terms of run off generations and surface water drainage.</p>	<p>Flood risk is addressed within Chapter 10 of the ES (ref Table 10.3).</p> <p>[EN010147/APP/6.3] A flood Risk assessment has been undertaken amongst other assessments. No adverse effects are predicted during construction, operation or the decommissioning phases of the Project.</p> <p>It is considered that the Project complies with Policy RNE2.</p>	
Policy T11 – Sustainable Transport	<p>“A. As appropriate to its scale, nature and location new development should incorporate a balanced and sustainable transport provisions, including;</p> <ul style="list-style-type: none"> • Facilities for cycling; • Off street parking provision; • Convenient pedestrian links to public transport facilities; • Electric charging points for vehicles. <p>B. New development should not have an unacceptable impact on</p>	<p>Chapter 12 in the ES, considers relevant traffic and transport proposals and environmental effects.</p> <p>Section 12.9 of this chapter assesses the impact of construction vehicle movements arising from the Project on the LRN and SRN.</p> <p>No significant adverse effects are predicted.</p> <p>[EN010147/APP/6.3]</p> <p>The Project protects existing and provides new pedestrian links and a new cycle link (see Landscape, Ecology</p>	

Policy	Description	Comment	Local Authority Comment
	<p>the free and safe flow of traffic in general, and at the following locations in particular:</p> <ul style="list-style-type: none"> i. Land adjacent to or near to the A420 approaching Botley Interchange; ii. Lower Cumnor Hill and Eynsham Road; iii. The historic village core of Cumnor; iv. Swinford Toll Bridge." 	<p>and Amenities Plan ref [EN010147/APP/7.3.3]).</p> <p>The Project is substantially in accordance with Policy T11.</p>	
Policy T12 – Cycle Routes	<p>The B4044 cycle route as shown on map 19 is safeguarded. New development adjacent to this should enhance the safety and amenity of the proposed cycle path and development proposal should not compromise the scope for public access to the protected route.</p> <p>Development proposals that maximise opportunities for cycle movements to promote connectivity within and between the settlements will be supported.</p>	<p>Chapter 17, Agriculture, Land Use and Public Rights of Way assess effects upon rights of way.</p> <p>[EN010147/APP/6.3]</p> <p>It describes the temporary diversions necessary during construction and proposed permanent diversions. New permissive paths and a cycleway is proposed.</p> <p>No significant adverse effects are predicted.</p> <p>The Project accords with Policy T13.</p>	
Policy T13 – Footpaths and Bridleways	<p>"A. New development proposals should take into account the safety, accessibility and visual amenity of Cumnor's network of footpaths and bridleways. Developments proposals which would have an unacceptable impact on their accessibility and recreational amenity value will not be supported.</p> <p>B. Where it is practicable to do so new development should take opportunities to enhance the accessibility, connectivity and amenity of footpaths and public rights of way."</p>	<p>Chapter 17, Agriculture, Land Use and Public Rights of Way assess effects upon footpaths and bridleways.</p> <p>It describes the temporary diversions necessary during construction and proposed permanent diversions. The permanent diversions are limited in length and realign the statutory route to the existing 'desire line' of the right of way actually used by the public.</p> <p>Existing footpaths are protected, and new permissive paths and cycleway is proposed.</p> <p>No significant adverse effects are predicted.</p> <p>The Project accords with Policy T13.</p>	

Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy relevant policies and relevant ‘saved’ policies from the Minerals and Waste Local Plan (1996) (As submitted November 2024)

Policy	Description	Comment	Local Authority Comment
Policy M8 – Safeguarding Mineral Resources	Development preventing or hindering the possible future working of the mineral will not be permitted unless it can be shown that the site has been allocated, the need of the development outweighs the economic and sustainability consideration relating to the mineral resource or the mineral will be extracted prior to development. Within Mineral Consultation Areas, District Councils will consult the County Council on non-mineral development applications.	A Mineral Safeguarding Area for sharp sand and gravels has been identified within the Project area. In accordance with local planning policy a Mineral Resource Assessment (MRA) has been undertaken that demonstrates that although sand and gravel deposits of potential commercial interest are present sporadically beneath part of the Central Site area, the Project will not result in the permanent sterilisation of these resources. The MRA is presented as Chapter 11, Appendix 11.14 [EN010147/APP/6.5]. Notwithstanding, the Applicant considers the Project to be substantially in accordance with Policy M8	
Policy C11 – Rights of Way	Seeks to maintain and retain the integrity and amenity value of the rights of way network shall be maintained. Diversions should be safe, attractive and convenient and, if temporary, shall be reinstated as soon as possible. If permanent diversions are required, these should seek to enhance and improve the public rights of way network. Improvements and enhancements are generally encouraged.	Chapter 17, Agriculture, Land Use and Public Rights of Way assess effects upon footpaths and bridleways. [EN010147/APP/6.3] It describes the temporary diversions necessary during construction and permanent diversions. The permanent diversions are limited in length and realign the statutory route to the existing ‘desire line’ of the right of way actually used by the public. Existing footpaths are protected, and most enhanced with new planting. New	

Policy	Description	Comment	Local Authority Comment
		<p>permissive paths are proposed.</p> <p>No significant adverse effects are predicted.</p> <p>The Project accords with Policy C11.</p>	
Policy C12 – Green Belt	Proposals that constitute inappropriate development in the Green Belt, will not be permitted except in Very Special Circumstances, which will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.	<p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS (Appendix 8). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt, and any other harm.</p> <p>Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p> <p>The Project does not conflict with Policy C12.</p>	